FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Roots Division, Dresser Equipment Group, Inc.
900 West Mount Street
Connersville, Indiana 47331

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 041-7130-00010	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 10, 2001 Expiration Date: September 10, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary industrial and commercial blower and fan manufacturing source.

Authorized Individual:	Gary Redelman
Source Address:	900 West Mount Street, Connersville, Indiana 47331
Mailing Address:	900 West Mount Street, Connersville, Indiana 47331
SIC Code:	3564
Source Location Status:	Fayette
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) paint booth, identified as p.b. 1, constructed in 1990, equipped with high volume low pressure (HVLP), air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stacks 1A, 1B, 1C, and 1D, capacity: 0.33 large cast iron blowers per hour with an unknown capacity for various sized blowers.

(b) One (1) paint booth, identified as p.b. 3, constructed in 1991, equipped with high volume low pressure (HVLP), air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stack 2, capacity: 0.33 large cast iron blowers per hour with an unknown capacity for various sized blowers.

(c) One (1) paint booth, identified as p.b. 2, constructed before 1984, equipped with high volume low pressure (HVLP), air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stack 12, capacity: 9.0 small cast iron blowers per hour with an unknown capacity for various sized blowers.

(d) One (1) boiler, identified as b2, constructed in 1966, fired by natural gas and using no. 2 fuel oil as a backup fuel, exhausting to stack 9, maximum heat input capacity: 25.1 million British thermal units per hour.

(e) One (1) boiler, identified as b1, constructed in 1983, fired by natural gas and using no. 2 fuel oil as a backup fuel, exhausting to stack 8, maximum heat input capacity: 62.4 million British thermal units per hour.

(f) One (1) abrasives blast booth, identified as s.b. 1, constructed in 1981, equipped with separate nozzles for aluminum oxide grit, glass beads, and other abrasives, and a baghouse for particulate matter control, exhausting through stack 5, maximum capacity: 3,578

pounds per hour of aluminum oxide 20 grit, 1,994 pounds per hour of glass beads, or 500 pounds per hour of aluminum oxide 150 grit, with an unknown capacity for other abrasive materials.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) boiler, identified as b3, constructed in 1963, fired by natural gas, maximum capacity: 1.0 million British thermal units per hour.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(d) Melting of Babbitt bars to make soft hammers as needed at this source.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)][326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized

individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s), by name, position, or job description, responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof that an emergency occurred.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to

correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance,

or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. Copies and/or results from the use of this equipment will be provided to the Permittee within a reasonable time period after written request to IDEM.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative

enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8][326 IAC 2-2]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except PM, from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 not applicable.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit PM from the entire source shall be limited to less than 250 tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-2, Prevention of Significant Deterioration are not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accord-

ance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [[326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once per hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been

predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied;

(3) An automatic measurement was taken when the process was not operating;

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee’s failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing (Condition C.9), of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the designated reporting period for that report. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) One (1) paint booth, identified as p.b. 1, constructed in 1990, equipped with high volume low pressure (HVLP), air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stacks 1A, 1B, 1C, and 1D, capacity: 0.33 large cast iron blowers per hour with an indeterminable capacity for various sized blowers.

(b) One (1) paint booth, identified as p.b. 3, constructed in 1991, equipped with high volume low pressure (HVLP), air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stack 2, capacity: 0.33 large cast iron blowers per hour with an indeterminable capacity for various sized blowers.

(c) One (1) paint booth, identified as p.b. 2, constructed before 1984, equipped with high volume low pressure (HVLP), air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stack 12, capacity: 9.0 small cast iron blowers per hour with an indeterminable capacity for various sized blowers.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the blowers at each of the three (3) paint booths (p.b.1, p.b.2 and p.b.3) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 FESOP Limit [326 IAC 2-2] [40 CFR 52.21]

These facilities shall use less than 9.83 tons of each individual HAP, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, based on a twelve (12) month rolling total. This usage limit is required to limit the total source potential to emit of each individual HAP to less than 10 tons per twelve (12) consecutive month period.

D.1.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Any change or modification to these facilities that results in potential VOC emissions of 100 tons per year or more or potential total HAP emissions of 25 tons per year or more will require a Title V Part 70 Operating permit pursuant to 326 IAC 2-7 or a modification to this FESOP including a Federally Enforceable limit on VOC and/or total HAP emissions. Therefore, such change will require prior approval from IDEM, OAQ.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the three (3) paint booths (p.b.1, p.b.2 and p.b.3) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.7 HAP Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.8 Particulate Matter (PM)

In order to comply with D.1.4, the dry filters for PM control shall be in operation at all times when the three (3) paint booths (p.b.1, p.b.2 and p.b.3) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the proper placement, physical integrity and particle loading of the dry filters at the start and end of each coating operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (1A, 1B, 1C, 1D, 2 and 12) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily or monthly, as indicated, and shall be complete and sufficient to establish compliance with the VOC content limits and the HAP usage and emission limits established

in Conditions D.1.1 and D.1.2.

(1) The amount of coating and solvent used that contains or is a regulated VOC and/or HAP. The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day;

(4) The cleanup solvent usage for each month;

(5) The total individual HAP usage for each month; and

(6) The weight of each individual HAP emitted for each compliance period.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(d) One (1) boiler, identified as b2, constructed in 1966, fired by natural gas and using no. 2 fuel oil as a backup fuel, exhausting to stack 9, maximum heat input capacity: 25.1 million British thermal units per hour.

(e) One (1) boiler, identified as b1, constructed in 1983, fired by natural gas and using no. 2 fuel oil as a backup fuel, exhausting to stack 8, maximum heat input capacity: 62.4 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the one (1) boiler (b2), used for indirect heating purposes, which was existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 62.4 million British Thermal Unit per hour heat input boiler (b1) shall be limited to 0.34 pounds per million British Thermal Unit heat input.

This limitation is based on the following equation:

$Pt = 1.09 / Q^{0.26}$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. (Q = 88.5 MMBtu/hr)

D.2.3 Sulfur Dioxide (SO_2) [326 IAC 7-1.1-1][326 IAC 2-8] [326 IAC 7-2-1]

(a) Pursuant to 326 IAC 7-1.1 (SO_2 Emissions Limitations) the SO_2 emissions from the two (2) boilers when operating on no. 2 fuel oil shall not exceed five tenths (0.5) pounds per million British thermal unit heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average. 326 IAC 7-1.1 and 326 IAC 7-2-1 are not federally enforceable.

(b) In order for the source to remain in compliance with the requirements of 326 IAC 2-8 (FESOP), the sulfur content of the no. 2 fuel oil shall not exceed 0.25%, by weight.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.2.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million British thermal unit heat input and twenty-five hundredths percent (0.25%) by weight by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the two (2) boilers (b1 and b2), using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.6 Visible Emissions Notations

(a) Visible emission notations of the boiler stacks (stacks 8 and 9) exhaust shall be performed once per shift during normal daylight operations when no. 2 fuel oil is in use and when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps

in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications.

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of each boiler's stack exhaust once per shift.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Reporting Requirements

The natural gas fired boiler certification, shall be submitted semi-annually to the address listed in Section C - General Reporting Requirements, using the certification form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six month period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(f) One (1) abrasives blast booth, identified as s.b. 1, constructed in 1981, equipped with separate nozzles for aluminum oxide grit, glass beads, and other abrasives, and a baghouse for particulate matter control, exhausting through stack 5, maximum capacity: 3,578 pounds per hour of aluminum oxide 20 grit, 1,994 pounds per hour of glass beads, or 500 pounds per hour of aluminum oxide 150 grit, with an unknown capacity for other abrasive materials.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM and PM_{10}) [326 IAC 6-3-2][326 IAC 2-8]

(a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the abrasives blast facility shall not exceed 6.05 pounds per hour when operating at a process weight rate of 3,578 pounds per hour. This will also result in compliance with 326 IAC 2-8 (FESOP) and make the requirements of 326 IAC 2-2 (PSD) not applicable.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) Any change or modification that increases the process weight rate of the abrasives blast booth to 13.0 tons per hour may result in PM_{10} emissions of 100 tons per year or more and shall require prior approval to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 2-7 (Part 70 Permits).

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.3 Particulate Matter (PM)

In order to comply with D.3.1, the baghouse for PM control shall be in operation at all times when the abrasives blast facility is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.4 Visible Emissions Notations

(a) Visible emission notations of the abrasives blast baghouse stack exhaust shall be performed once per shift during daylight and under normal operating conditions when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.3.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the abrasives blasting, at least once per shift when the abrasives blasting process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.5 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the abrasives blasting operation. All defective bags shall be replaced.

D.3.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.8 Record Keeping Requirements

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations of the abrasives blast booth baghouse stack exhaust once per shift.

(b) To document compliance with Conditions D.3.1 and D.3.6, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(c) To document compliance with Condition D.3.1, the Permittee shall maintain records of the results of the inspections required under Condition D.3.6.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] - Insignificant Activities

(a) One (1) boiler, identified as b3, constructed in 1963, fired by natural gas, maximum capacity: 1.0 million British thermal units per hour.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(d) Melting of Babbitt bars to make soft hammers as needed at this source.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the one (1) boiler (b3), used for indirect heating purposes, which was existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the manufacturing activities, grinding and machining operations, and the melting of Babbitt bars shall each not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Roots Division, Dresser Equipment Group, Inc.
Source Address: 900 West Mount Street, Connersville, Indiana 47331
Mailing Address: 900 West Mount Street, Connersville, Indiana 47331
FESOP No.: F 041-7130-00010

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Affidavit (specify) _____

Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Roots Division, Dresser Equipment Group, Inc.
Source Address: 900 West Mount Street, Connersville, Indiana 47331
Mailing Address: 900 West Mount Street, Connersville, Indiana 47331
FESOP No.: F 041-7130-00010

This form consists of 2 pages **Page 1 of 2**

9	This is an emergency as defined in 326 IAC 2-7-1(12) ÇThe Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and ÇThe Permittee must submit notice by mail or facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Roots Division, Dresser Equipment Group, Inc.
Source Address: 900 West Mount Street, Connersville, Indiana 47331
Mailing Address: 900 West Mount Street, Connersville, Indiana 47331
FESOP No.: F 041-7130-00010

9 Natural Gas Only 9 Alternate Fuel burned From:_____ To:_____
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Roots Division, Dresser Equipment Group, Inc.
Source Address: 900 West Mount Street, Connersville, Indiana 47331
Mailing Address: 900 West Mount Street, Connersville, Indiana 47331
FESOP No.: F 041-7130-00010
Facility: Three (3) paint booths (pb1, pb2, and pb3)
Parameter: Total usage of each individual HAP
Limit: less than 9.83 tons per consecutive twelve (12) months of each individual HAP

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Roots Division, Dresser Equipment Group, Inc.
Source Address: 900 West Mount Street, Connersville, Indiana 47331
Mailing Address: 900 West Mount Street, Connersville, Indiana 47331
FESOP No.: F 041-7130-00010

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name:	**Roots Division, Dresser Equipment Group, Inc.**
Source Location:	**900 West Mount Street, Connersville, Indiana 47331**
County:	**Fayette**
SIC Code:	**3564**
Operation Permit No.:	**F 041-7130-00010**
Permit Reviewer:	**CarrieAnn Ortolani**

On February 24, 1999, the Office of Air Quality (OAQ) had a notice published in the News Examiner, Connersville, Indiana, stating that Roots Division, Dresser Industries (now Roots Division, Dresser Equipment Group, Inc.) had applied for a Federally Enforceable State Operating Permit (FESOP) to operate an industrial and commercial blower and fan manufacturing source with dry filters and a baghouse as controls. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On February 26, 1999, Kellee Cobb of Roots Division, Dresser Equipment Group, Inc. submitted comments on the proposed FESOP. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Comment 1:

The Roots information on the title page of the permit should be amended to reflect the acquisition of our parent company Dresser Industries by Halliburton Company.

Roots Division, Dresser Equipment Group, Inc.
900 West Mount Street
Connersville, Indiana 47331

Response 1:

The title page has been revised as follows:

Roots Division, ~~Dresser Industries~~ **Dresser Equipment Group, Inc.**
900 West Mount Street
Connersville, Indiana 47331

The name of the company has also been changed in the header and in the forms attached to the permit.

Comment 2:

Paragraph A.2, Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)], should be amended to read:

(a) One (1) paint booth, identified as p.b.1, constructed in 1990, equipped with high volume low pressure (HVLP) or air assisted airless, or electrostatic spray guns, and dry filters as over-spray control, exhausting to stacks 1A, 1B, 1C and 1D, and having an average coating application capacity of 0.33 large blowers per hour with an unknown capacity for various sized blowers. This paint booth has the constraint on its operation that only a maximum of two (2) spray guns can be used simultaneously, with each gun applying only one coating material.

(b) One (1) paint booth, identified as p.b.3, constructed in 1991, equipped with high volume low pressure (HVLP), or air assisted airless, or electrostatic spray guns, and dry filters as over spray control, exhausting to stack 2, and having an average coating application capacity of 0.33 large blowers per hour with an unknown capacity for various sized blowers. This paint booth has the constraint on its operation that only a maximum of one (1) spray gun can be used at any one time, applying only one coating material.

(d) One (1) paint booth, identified as p.b.2, constructed before 1984, equipped with high volume low pressure (HVLP), or air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stack 12, and having an average coating capacity of 9.0 small blowers per hour with an unknown capacity for various sized blowers. This paint booth has the constraint on its operation that only a maximum of one (1) spray gun can be used at any one time, applying only one coating material.

(f) One (1) abrasives blast booth, identified as s.b.1, constructed in 1981, equipped with separate nozzles for aluminum oxide grit, glass beads and other abrasives, and a baghouse for particulate matter control that exhausts through stack 5 and having blasting capacity of 3578 pounds per hour of aluminum oxide 20 grit or 1994 pounds per hour of glass beads, or 500 pounds per hour of aluminum oxide 150 grit, with an unknown capacity for other abrasive materials. This blast booth has the physical constraint on its operation that it can be occupied by only one (1) operator at a time, using only one (1) nozzle and one (1) abrasive media.

Response 2:

As stated in the introductory paragraph of Section A, "This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application."

Conditions D.1.2 and D.1.3 prevent the source from being a major Title V source of VOC and/or HAPs without prior approval. Records will be maintained of VOC and HAP usage. Therefore, the physical constraints requested to Section A.2 items (a), (b), and (d) are not necessary. The construction date for p.b. 2 has been changed as follows:

~~(d)~~**(c)** One (1) paint booth, identified as p.b. 2, constructed ~~after 1990~~ **before 1984,** equipped with high volume low pressure (HVLP), air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stack 12, capacity: 9.0 small cast iron blowers per hour with an unknown capacity for various sized blowers.

A worst case scenario for the abrasives blasting was computed on page 1 of 1 of TSD Addendum Appendix A. This scenario uses the worst case nozzle with each type of abrasive (sand, aluminum grit, and steel). Therefore, the following changes were made to item (f) of Section A.2 and to item (f) in the facility description for Section D.3:

(f) One (1) ~~sand~~ **abrasives** blast booth, identified as s.b. 1, constructed in 1981, equipped with separate nozzles for aluminum oxide ~~20~~ grit, glass bead**s**, and ~~aluminum oxide 150 grit~~ **other abrasives,** and a baghouse for particulate matter control, exhausting through stack 5, maximum capacity: 3,578 pounds per hour of aluminum oxide 20 grit, 1,994 pounds per hour of glass bead**s**, or ~~327~~ **500** pounds per hour of aluminum oxide 150 grit**, with an unknown capacity for other abrasive materials**.

The abrasives blast booth will be limited by the requirements of 326 IAC 6-3-2 as stated in Condition D.3.1. In order to remain a minor source pursuant to Part 70, 326 IAC 2-7, the annual PM_{10} emissions must be less than 100 tons per year. Any change or modification that increases the process weight rate of the abrasives blast booth to 13.0 tons per hour or more will result in an allowable PM emission rate from the abrasive blast facility of 22.9 pounds per hour or more. Any such change or modification may result in PM_{10} emissions of 22.9 pounds per hour or more, equivalent to 100 tons per year or more. Pursuant to 326 IAC 2-8, PM_{10} emissions of 100 tons per year or more exceed the limitations of this permit and require prior approval. This process weight rate has been added to the permit. Therefore, the physical constraints suggested are not necessary and Condition D.3.1 has been revised in response to this comment and as explained in IDEM Change 53 as follows:

D.3.1 Particulate Matter (PM **and PM_{10}**) [326 IAC 6-3**-2**]**[326 IAC 2-8]**

(a) Pursuant to 326 IAC 6-3**-2** (Process Operations), the allowable PM emission rate from the ~~sand~~ **abrasives** blast facility shall not exceed 6.05 pounds per hour when operating at a process weight rate of 3,578 pounds per hour. This will also result in compliance with 326 IAC 2-8 (FESOP) and make the requirements of 326 IAC 2-2 (PSD) not applicable.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Any change or modification that increases the process weight rate of the abrasives blast booth to 13.0 tons per hour may result in PM_{10} emissions of 100 tons per year or more and shall require prior approval to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 2-7 (Part 70 Permits).

Comment 3:

The following changes are requested to Paragraph A.3, Insignificant Activities [326 IAC 2-7-1 (21)] [326 IAC 2-8-3 (c) (3) (1)]:

Subparagraph (a) should have “using no. 2 fuel oil as backup” removed, as that boiler does not have that capability.

Subparagraph (b) should be amended to read: The following equipment related to manufacturing activities that discharges or could be expected to discharge air emissions to the outside atmosphere but not the emission of HAPs:

Subparagraph (c) should be amended to read: Grinding and machining operations with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and an air flow rate less than or equal to 4,000 actual cubic feet per minute, including the following:

Subparagraph (d) should be amended to read: Melting of Babbit bars to make soft hammers (emissions equal to or less than 0.6 tons per year of lead).

Reason- The presented information was clarified. Regulated emissions are those that are discharged to the atmosphere outside of buildings and other enclosures. The control units presented in Subparagraph (c) are air cleaning devices. Soft hammers are made on an "as needed" basis and not on a production schedule, so a ton per year limit is more reasonable than a pound per day limit.

Response 3:

Since the Babbitt Bars are melted only to make soft hammers for use at this source and the hammers are not manufactured as a product of this source, the operation will take place infrequently and, by its nature, result in lead emissions less than 0.6 tons per year. Therefore, this operation is an insignificant activity. The emission rate will not be included in the facility description. Section A.3 and the facility descriptions in Section D.4 have been revised as follows:

(a) One (1) boiler, identified as b3, constructed in 1963, fired by natural gas ~~and using no.2 fuel oil as a backup fuel~~, maximum capacity: 1.0 million British thermal units per hour.

(c) Grinding and machining operations ~~controller~~ **controlled** with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(d) Melting of Babbitt bars to make soft hammers **as needed at this source** ~~(emissions equal to or less than 0.6 tons per year or 3.29 pounds per day of lead)~~.

The insignificant activities are defined by 326 IAC 2-7-1, Part 70 permits: definitions, as they appear in items (b) and (c) of Section A.2. Therefore, those facility descriptions will not be changed further.

Comment 4:

The following changes are requested to Paragraph A.5, Prior Permit Conditions:

Subparagraph (a) should be amended to read: This permit shall be used as the primary document for determining compliance with applicable requirements. Requirements established by previously issued permits shall be used to determine compliance during the effective period of those permits.

Reasons -The presented information was amended to make it clear that the regulations that are in effect at a given time are the measure of compliance for practices conducted at that time.

Response 4:

Effective periods of previously issued permits may continue after the issuance date of this permit. However, upon its issuance, this FESOP permit will be the primary document for determining compliance with applicable requirements. There is no change to the permit as a result of this comment.

Section B

Comment 5:

Paragraph B.4, Enforceability [326 IAC 2-8-6], Subparagraph (b), should be amended to read: Except for terms and conditions specified in Section D Facility Operation Conditions, et al., as State Enforceable conditions, all terms and conditions of this permit, including any provisions to limit the sources potential to emit, are enforceable by the United States Environmental Protection Agency (USEPA) and citizens under the Clean Air Act.

Response 5:

Pursuant to 326 IAC 2-8-6(b), all terms and conditions in a FESOP are enforceable by the U.S. EPA and citizens under the Clean Air Act. Therefore, only conditions that specifically state that they are not federally enforceable are not federally enforceable. There are no changes to the permit is response to this comment. Condition B.4 has been revised as explained in IDEM Change 6.

Comment 6:

Paragraph B.13, Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4 (9)] [326 IAC 2-8-5 (a) (1)], Subparagraph (a), line (1), should be amended to read: Identification of the position(s), by job description, responsible for inspecting, maintaining, and repairing emissions control devices.

Reasons - Clarification was provided. Job descriptions are more appropriate as a permit condition than employees names because employees may change jobs in a plant. Job descriptions are more definitive.

Response 6:

Condition B.13(a)(1) has been revised as follows:

(1) Identification of the individual(s)**, by name, position, or job description,** responsible for inspecting, maintaining, and repairing emission control devices;

Comment 7:

Paragraph B.14, Emergency Provisions [326 IAC 2-8-12], Subparagraph (c), should be amended to read: In any enforcement proceeding the Permittee seeking to establish the occurrence of an emergency has the burden of proof that an emergency occurred.

Response 7:

Since the request does not change the requirements of this condition, Condition B.14(c) has been revised as follows:

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof **that an emergency occurred**.

Comment 8:

Paragraph B.14, Subparagraph (g), line (1), should be amended to read: If the emergency situation causes a deviation from a technology– based limit, the Permittee may continue to operate the affected emitting facility during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions exceeding the technology-based limit.

Response 8:

Pursuant to 326 IAC 2-8-12(g)(1), the Permittee must immediately take all responsible steps to correct the emergency and minimize emissions. The emissions exceeding the technology-based limit are not solely addressed. Therefore, there will be no changes to the requirements of Condition B.14(g)(1).

Comment 9:

Paragraph B.14, Subparagraph (g), line (2) (A) should be amended to read: The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions exceeding the health-based emissions limit; and

Response 9:

Pursuant to 326 IAC 2-8-12(g)(2)(A), the Permittee must immediately take all responsible steps to correct the emergency situation and minimize emissions. The emissions exceeding the health-based limit are not solely addressed. Therefore, there will be no changes to the requirements of Condition B.14(g)(2)(A).

Comment 10:

Omit the statement in Paragraph B.15 that appears between subparagraph (b) and (c). It states: A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Reasons - This statement is not needed because an excursion from a permitted monitoring parameter is a permit violation and therefore a deviation by definition above.

Response 10:

That paragraph is part of Condition B.15(b). It clarifies that although a deviation does not include an excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit, it does include a Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred.

Comment 11:

Paragraph B.21 (now B.19), Operational Flexibility [326 IAC 2-8-15], Subparagraph (a), line (1), should be amended to read: The changes are not major modifications under any provisions of Title I of the Clean Air Act;

Response 11:

326 IAC 2-8-15(a)(1) specifically states, "The changes are not modifications under any provision of Title I of the Clean Air Act." Therefore, the word "major" will not be added to describe the type of modification. A modification subject to an NSPS promulgated under Section 111 of the Clean Air Act is an example of a modification covered by this language.

Comment 12:

(a) Paragraph B.23, Inspection and Entry [326 IAC 2-8-5 (a) (2)], line (a) should be amended to read: At reasonable times and escorted by a representative of the Permittee, enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Paragraph B.23, Subparagraph (e) should be amended to read: Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5 (a) (4)] Copies and/or results from the use of this equipment will be provided to the Permittee within a reasonable time period after written request to IDEM.

Reasons -The requirements of a safe work place dictate that all visitors be escorted by a suitable plant representative. Data collected during a plant visit should be shared with plant management.

Response 12:

(a) Pursuant to 326 IAC 2-8-5(a)(2), upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit. The authorized representative must be able to visit the site at any time. IDEM, OAQ, intends to adhere to reasonable safety practices at the plant, including authorized representatives being escorted by a plant representative. This condition has been revised as explained in IDEM Change 20.

(b) Condition B.23 (e) (now B.21(e)) has been revised in response to this comment and as explained in IDEM Change 20 as follows:

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements ~~[326 IAC 2-8-5(a)(4)]~~. **Copies and/or results from the use of this equipment will be provided to the Permittee within a reasonable time period after written request to IDEM.**

~~(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326~~

~~IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~

~~(2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

Section C

Comment 13:

Paragraph C.1, Overall Source Limit [326 IAC 2-8], should be amended to read: The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502 (a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one hundred (100) tons *per twelve (12) consecutive month* period. This limitation shall also make the requirements of 326 IAC 2-2 not applicable.

(2) The potential to emit of any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons *per twelve (12) consecutive month* period; and

(3) The potential to emit any combination of hazardous air pollutants (HAPs) from the entire source shall be limited to less than twenty-five (25) tons *per twelve (12) consecutive month* period.

Reasons-CAA definitions and regulations make it clear that PTE emission limits are based on tons emitted in a year and not on consecutive day periods. The latter would limit production at the Roots plant because production is scheduled in varying "lot sizes" and not as a continuous production line.

(b) This condition shall include all emissions points that discharge or could be expected to discharge regulated air pollutants to the outside atmosphere at this source including those that are insignificant as defined in 326 IAC 2-7-1 (21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's actual emissions do not exceed the above specified limits.

Reasons - Regulated emissions are those that are discharged to the atmosphere outside of buildings and other enclosures.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

Response 13:

Condition C.1(a) has been revised as requested. The definition of "emissions unit" according to 326 IAC 1-2-23.5 is "any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant under the Clean Air Act (CAA)." The definition of "regulated pollutant" accord-

ing to 326 IAC 1-2-66 is "any pollutant for which a rule establishing emission limitations or requirements has been promulgated by the board." Therefore, the wording of Condition C.1(b) sufficiently explains the intent of the condition. Emission units exhausting inside may result in outside air pollution by leaving the plant through doors and windows. Condition C.1 is also revised to specify the limitations for PM. Condition C.1 has been revised as follows:

C.1 Overall Source Limit [326 IAC 2-8]**[326 IAC 2-2]**

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant**, except PM,** from the entire source shall be limited to less than one-hundred (100) tons per ~~three hundred sixty-five (365) consecutive day~~ **twelve (12) consecutive month** period. This limitation shall also make the requirements of 326 IAC 2-2 not applicable.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per ~~three hundred sixty-five (365) consecutive day~~ **twelve (12) consecutive month** period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per ~~three hundred sixty-five (365) consecutive day~~ **twelve (12) consecutive month** period.

(b) The potential to emit PM from the entire source shall be limited to less than 250 tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-2, Prevention of Significant Deterioration are not applicable.

~~(b)~~**(c)** This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

~~(c)~~**(d)** Section D of this permit contains independently enforceable provisions to satisfy this requirement.

Comment 14:

The titles for Paragraph C.2, Opacity [326 IAC 5-1], Paragraph C.4, Incineration [326 IAC 9-1-2 (3)], Paragraph C.6, Operation of Equipment [362 IAC 2-8-5 (a) (4)], Paragraph C.7, Stack Height [326 IAC 1-7], Paragraph C.9, Performance Testing [326 IAC 3-6], Paragraph C.10, Compliance Monitoring [326 IAC 2-8-4 (3)] [326 IAC 2-8-5 (a) (1)], Paragraph C.17, Monitoring Data Availability, Paragraph C.11, Maintenance of Monitoring Equipment [326 IAC 2-8-4 (3) (A) (iii)], Paragraph C.12, Monitoring Methods [326 IAC 3], Paragraph C.13, Pressure Gage Specifications, Paragraph C.14, Risk Management Plan [326 IAC 2-9-4] [40 CFR 68.215], Paragraph C.15, Compliance Monitoring Plan – Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5], Paragraph C.16, Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5], Paragraph C.18 General Record Keeping Requirements [326 IAC 2-8-4 (3)] [326 IAC 2-8-5], Paragraph C.19, General Reporting Requirements [326 IAC 2-8-4 (3)(c)], should be amended to add the words "Federally Enforceable" to the end of the title. For example "C.2 Opacity [326 IAC

5-1] Federally Enforceable."

Reasons -Changes were made to provide clarification. It is important to identify the requirements that are federally enforceable and state enforceable.

Response 14:

Pursuant to 326 IAC 2-8-6(b), all terms and conditions in a FESOP are enforceable by the U.S. EPA and citizens under the Clean Air Act. As stated in Condition B.4, "Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act." Therefore, there is no need to label certain conditions "Federally Enforceable." Only conditions that are not federally enforceable must be qualified "not federally enforceable." Adding "Federally Enforceable" to the title of some conditions would be misleading in that it would imply that other conditions are not federally enforceable simply because "Federally Enforceable" is not part of the title. There is no change to the permit as a result of this comment. As indicated in IDEM Changes 25 and 27, Conditions C.4 and C.7 now specify which provisions are not federally enforceable.

Comment 15:

(a) The title for Paragraph C.3, Open Burning [326 IAC 4-1] [IC 13-17-9], should be amended to read: Open Burning [326 IAC 4-1] [326 IAC 13-17-9], Federally Enforceable except [326 IAC 13-17-9] and as noted in this paragraph.

(b) The title for Paragraph C.5, Fugitive Dust Emissions [326 IAC 6-4], should be amended to read: Fugitive Dust Emissions [326 IAC 6-4], Federally Enforceable except as noted in this paragraph.

Response 15:

See Response 14. There is no change to the permit as a result of this comment.

Comment 16:

The following changes are requested to the text of Paragraph C.7, Stack Height [326 IAC 1-7]. The paragraph should be amended to read: The Permittee shall comply with applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential to emit (before controls) of one hundred (100) tons per year or more of particulate matter or sulfur dioxide is emitted.

Response 16:

Pursuant to 326 IAC 1-7-1, Stack Height Provisions: Applicability, the rule applies to all sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide are emitted. Pursuant to 326 IAC 1-7-5(a), all sources having less than twenty-five (25) tons per year of actual emissions (after controls) shall be exempted from the requirements specified in 326 IAC 1-7-3(a). There is no 100 tons per year requirement associated with this rule. There are no changes to the permit as a result of this comment.

Comment 17:

The title for paragraph C.8, Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140], should be amended to read: Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18], not Federally Enforceable except as noted in this paragraph, and [40 CFR 61.140] Federally Enforceable.

Response 17:

See Response 14. There is no change to the permit as a result of this comment.

Comment 18:

The text of Paragraph C.8, Subparagraphs (a) and (b) should be amended to read:

(a) Notification requirements apply to each owner or operator. If the combined amount of requested asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner of least ten (10) working days before asbestos stripping or removal work or before demolition involving asbestos, per 326 IAC 14-10-3, and shall update such notice as necessary, including but not limited to the following:

Reasons -To report all demolition projects is unnecessarily burdensome for both the Roots and IDEM. The regulations require that reporting be done when asbestos is present above certain thresholds.

Response 18:

Pursuant to 326 IAC 14-10-2(14) (Definitions), “demolition” means the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility. Pursuant to 326 IAC 14-10-1(a)(1) (Applicability), notification is required even if no asbestos is present. There will be no changes to this condition in the final permit due to this comment.

Comment 19:

Paragraph C.16, Subparagraph (a) should be amended to read: When the results of a stack test performed in conformance with Section C, Paragraph C.9 (Performance Testing), of this permit exceed compliance levels specified in any condition of Section D of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions that exceed the limits, established in Section D, from the affected facility, while the corrective actions are being implemented. (The rest of this subparagraph remains as presented in the Draft Permit.)

Response 19:

See Response 8 for the reason "that exceed the limit, established in Section D, from the affected facility" was not included in the condition as requested. Also, the compliance levels may be specified in any section of the permit, not only Section D. Condition C.16(a) (now C.17(a)) has been revised in response to this comment and as explained in IDEM Change 37 as follows:

(a) When the results of a stack test performed in conformance with Section C - Performance Testing **(Condition C.9)**, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate ~~corrective~~ response actions. The Permittee shall submit a description of these ~~corrective~~ response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize **excess** emissions from the affected facility while the ~~corrective~~ response actions are being implemented. ~~IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~

Comment 20:

Paragraph C.17, Monitoring Data Availability, should be amended to read:

(a) With the exception of performance tests conducted in accordance with Section C, Paragraph C.9 Performance Testing, all observations, sampling, maintenance procedures, and record keeping required as a condition of this permit shall be performed when the equipment is operating under normal production conditions.

(b) As an alternative to the observations, sampling, maintenance procedures and record keeping of Subparagraph (a), above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is not operating under normal production conditions, additional observations and sampling should be taken with a record made of this condition and the nature of it.

(d) If for reasons beyond it's control, the Permittee fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) (No change is requested to this Subparagraph.)

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) and (b), above.

Response 20:

Condition C.17 has been removed from the permit as explained in IDEM Change 38.

Comment 21:

(a) The text of paragraph C.18, General Record Keeping Requirements, Subparagraph (a) should be amended to read: Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring. These records shall be kept at the source location for a minimum of three (3) years and be available upon the request of an authorized IDEM, or OAQ representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available, upon request, to an authorized IDEM or OAQ representative. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within ninety (90) days.

(b) The text of paragraph C.18, Subparagraph (c), line (4) should be amended to read: Records of preventative maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions established in Section D. These records may include, but are not limited to: work orders, parts inventories, and standard operating procedures. Records of response steps taken shall indicate whether the response steps of the Compliance Response Plan were performed, as required by Section C, Paragraph C.15 Compliance Monitoring Plan – Failure to take Response Steps, of this permit, and if a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

Reasons-Only authorized state and federal representatives are welcome to review records. A "reasonable time" has been defined as ninety (90) days to add certainty to the requirement to furnish records.

Response 21:

(a) If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time. IDEM, OAQ, previously changed the requirement from "within one (1) hour" to "within a reasonable time." Ninety (90) days cannot be determined a reasonable time frame at this time. Condition C.18(a) has been revised in response to this comment and as explained in IDEM Change 39 as follows:

(a) Records of all required ~~monitoring~~ data, **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years ~~and available upon the request~~. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Condition C.18(c)(4) has been removed from the permit as explained in IDEM Change 39.

Comment 22:

In the text of Paragraph C.19, Subparagraph (d) should be amended to read: Unless otherwise specified in this permit, the Quarterly Compliance Monitoring Report, Subparagraph (a), above, shall

be submitted within thirty (30) days of the end of the designated reporting period for that report. In the text of Paragraph C.19, Subparagraph (g) should read: The Quarterly Compliance Monitoring Report, Subparagraph (a), above, shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Response 22:

In response to this comment and as indicated in IDEM Change 40, Condition C.19 (General Reporting Requirements) (d) has been revised so that it is clear that the reports it refers to are the ones required by section D. The IDEM acknowledges a lot of confusion between C.19(a) and (d); (a) is referring to the Compliance Monitoring Report found in the back of the permit and (d) is referring to the quarterly reports which are required in Section D. The Quarterly Compliance Monitoring Report in the back of the permit is now the Quarterly Deviation and Compliance Monitoring Report. Condition C.19(g) (now C.19(e)) has been revised to clarify that quarterly and semi-annual reports are based on calendar years, not on when the permit is issued. For example if a source is issued a permit in February, they need to submit their first quarterly report in March. Condition C.19(g) (now C.19(e)) pertains to all reports required by this permit; Therefore, the condition will not be changed as requested. References to the emergency report has been removed, and all of the information is in Condition B.13. The report does need to be certified by the responsible official.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] **[326 IAC 2-1.1-11]**

(a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit ~~a~~ **the attached** Quarterly **Deviation and** Compliance Monitoring Report **or its equivalent**. Any deviation from ~~the~~ **permit** requirements, ~~and~~, the date(s) of each deviation**, the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The **Quarterly Deviation and** Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly **or** semi-annual report **required in Section D of this permit** shall be submitted within thirty (30) days of the end of the **designated** reporting period **for that report**. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence~~

~~Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

~~(g)~~**(e)** The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**

Comment 23:

The title of Paragraph C.20, Compliance with 40 CFR 82 and 326 IAC 22-1, should be amended to read: Compliance with 40 CFR 82 and 326 IAC 22-1, not Federally Enforceable.

Response 23:

See Response 14. There is no change to the permit as a result of this comment.

Section D

Comment 24:

The text appearing in the box under the title "Facility Description [326 IAC 2-8-4 (10)]" should be amended to read:

(a) One (1) paint booth, identified as p.b.1, constructed in 1990 equipped with high volume low pressure (HVLP), or air assisted airless, or electrostatic spray guns, and dry filters as over spray control, exhausting to stacks 1A, 1B, 1C and 1D, and having an average coating application capacity of 0.33 large castings per hour with an indeterminable capacity for various sized blowers. This paint booth has the constraint on its operation that only a maximum of two (2) spray guns can be used simultaneously, with each gun applying only one coating material.

(b) One (1) paint booth, identified as p.b.3, constructed in 1991, equipped with high volume low pressure (HVLP), or air assisted airless, or electrostatic spray guns, and dry filters as over-spray control, exhausting to stack 2 and having an average coating application capacity of 0.33 large castings per hour with an indeterminable capacity for various size blowers. This paint booth has the constraint on its operation that only a maximum of one (1) spray gun can be used at any one time, applying only one coating material.

(c) One (1) paint booth, identified as p.b.2, constructed before 1984; equipped with high volume low pressure (HVLP), or air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stack 12, and having an average coating application capacity of 9.0 small castings per hour with an indeterminable capacity for various sized blowers. This paint booth has the constraint on its operation that only a maximum of one (1) spray gun can be used at any one time, applying only one coating material.

Response 24:

See Response 2.

Comment 25:

The text of paragraph D.1.1, Volatile Organic Compound (VOC) [326 IAC 8-2-9], should be amended to read: Pursuant to 326-IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the blowers at the three (3) paint booths (p.b.1, p.b.2 and p.b.3) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for air dried coatings.

Solvent, identified as, or containing, a regulated VOC, sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and this waste solvent shall be disposed of in such a manner that evaporation is minimized.

Comments-Only regulated VOCs must be controlled.

Response 25:

Any facility subject to 326 IAC 8-2-9 is subject to 326 IAC 8-2-9(f) which states, "Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized." Solvent is defined in 326 IAC 1-2-72 as "organic materials which are liquid at standard conditions and which are used as dissolvers, viscosity reducers, or cleaning agents." Therefore, the wording in Condition D.1.1 satisfies the requested wording, and there are no changes to the permit as a result of this comment.

Comment 26:

The text of paragraph D.1.2, FESOP Limit [326 IAC 2-2] [40 CFR 52.21], should be amended to read: These facilities shall emit less than 9.83 tons of each individual HAP per each consecutive year starting with the effective date of this permit and continuing for the life of this permit. This emissions limit is required to limit the total source potential to emit each individual HAP to less than 10 tons per year.

Comments-The rolling monthly total was eliminated because HAPs are based on tons per year and it would put an unnecessary restriction on production.

Response 26:

The FESOP limits are in tons per year, not calendar year. In order to comply with the FESOP limits, the source may not emit more than 10 tons of any individual HAP in any consecutive twelve (12) months. Therefore, the limit is based upon a twelve (12) month rolling total. Condition D.1.2 has been revised for clarity as follows:

D.1.2 FESOP Limit [326 IAC 2-2] [40 CFR 52.21]

These facilities shall use less than 9.83 tons of each individual HAP, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period**, based on a twelve (12) month rolling total**. This usage limit is required to limit the total source potential to emit of each individual HAP to less than 10 tons per twelve (12) consecutive month period.

Comment 27:

The last sentence in paragraph D.1.7, Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs), should be amended to read: IDEM, OAQ reserves the authority to determine compliance using Method 24 (40 CFR 60, Appendix A) in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Response 27:

The last sentence of Condition D.1.7 (now D.1.6) has been removed as explained in IDEM Change 43.

Comment 28:

Paragraph D.1.8, HAP Emissions, should be amended to read: Compliance with Condition D.1.2 shall be demonstrated at the end of each month of the year long compliance period by calculating the HAPs emitted during the month based on usage, and totaling the monthly quantities determined to date.

Comments-The rolling monthly total was eliminated because HAPs are based on tons per year and it would put an unnecessary restriction on production.

Response 28:

See Response 26. There will be no changes to the permit as a result of this comment.

Comment 29:

Paragraph D.1.10, Monitoring, should be amended to read:

(a) Daily inspections shall be performed to verify the proper placement, physical integrity and particle loading of dry filters at the start and end of each coating operation to monitor their performance. The Compliance Response Plan shall be followed whenever a condition exists which requires a response step. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan – Failure to Take Response Steps, shall be considered a violation of this permit.

(b) The Compliance Response Plan for the Paint booth operations shall contain trouble-shooting, contingency and response steps covering noticeable changes in the performance and physical integrity of the dry filters. The Compliance Response Plan shall be followed whenever a condition exists which requires a response step. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan – Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Any additional inspections and preventative measures that may be needed, shall be performed as prescribed in the Preventive Maintenance Plan.

Reasons-Looking for overspray on the plant roof poses a very dangerous situation. The roof does not have safe access or platforms that can be used. It is also doubtful that this requirement would work in the winter. A better approach is to closely monitor the dry filters.

Response 29:

Condition D.1.10 (now D.1.9) has been revised to remove the requirement of making overspray observations on the roof of the plant or any observation that requires access to the roof. The coating emissions from the stacks can be inspected from another location.

D.1.~~10~~**9** Monitoring

(a) Daily inspections shall be performed to verify the **proper** placement, **physical** integrity and particle loading of the **dry** filters **at the start and end of each coating operation**. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (1A, 1B, 1C, 1D, 2 and 12) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the ~~rooftops and the~~ nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment 30:

(a) Paragraph D.1.11, Record Keeping Requirements, Subparagraph (a), line (1) should be amended to read: The amount of coating and solvent used that contains, or is a regulated VOC and/or HAP. The VOC and HAP content of each coating material, solvent or other material used. Records shall include purchase orders, or invoices, and/or material safety data sheets (MSDS) as necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(b) Paragraph D.1.11, Subparagraph (a), the last sentence should be amended to read: Records maintained for (1) through (6) shall be taken daily or monthly, as indicated, and shall be complete and sufficient to establish compliance with the VOC content limits and the HAP emission limits established in conditions D.1.1 and D.1.2.

Response 30:

(a) Since the requested wording maintains that the Permittee must keep records of the VOC and HAP content of each coating used, the condition has been revised as requested. The Permittee will not be required to keep records of the amount of coating and solvent used that does not contain a regulated VOC or a HAP. Condition D.1.11(a) (now D.1.10(a)) has been revised as follows:

(1) **The amount of coating and solvent used that contains or is a regulated VOC and/or HAP.** The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(b) Since Condition D.1.2 contains a HAP usage limitation, there are no changes to the permit as a result of this comment.

Comment 31:

Paragraph D.1.11, Subparagraph (b) should be amended to read: To document compliance with Condition D.1.10, the Permittee shall maintain a log of observations made during daily dry filter inspections, and those inspections prescribed by the Preventative Maintenance Plan.

Reasons-Changes were made to add clarification to the text and to keep it consistent with changes made earlier.

Response 31:

Although the requirement to monitor overspray on the rooftops has been removed, there are still mandatory weekly and monthly inspections in Condition D.1.10 (now D.1.9). There are no changes to the permit as a result of this comment.

Comment 32:

The following statement should be added to the paragraph entitled “Emission Limitations and Standards [326 IAC 2-8-4(1)]” as follows:

D.1. Specific Federally Enforceable Operating Condition

(a) It is a federally enforceable condition of this permit that paint booth p.b.1be operate with no more than a maximum of two (2) paint spray guns in use at any time and that each one apply only one (1) coating material at a time.

(b) It is a federally enforceable condition of this permit that paint booth p.b.3 be operated with no more than a maximum of one (1) paint spray gun in use at any time and that it will apply only one (1) coating material at a time.

(c) It is a federally enforceable condition of this permit that paint booth p.b.2 be operated with no more than a maximum of one (1) paint spray gun in use at any time and that it will apply only one (1) coating material at a time.

Reasons - The federally enforceable conditions for the three paint booths limit the determination of PTE for VOCs and HAPs to the actual production conditions that exist.

Response 32:

See Response 2.

Comment 33:

Paragraph D.2.3(b), Sulfur Dioxide (SO_2) [326 IAC 7-1.1-1] [326 IAC 2-8], should be amended by adding the words “by weight” at the end of the sentence.

Response 33:

Condition D.2.3(b) has been revised as follows:

(b) In order for the source to remain in compliance with the requirements of 326 IAC 2-8 (FESOP), the sulfur content of the no. 2 fuel oil shall not exceed 0.25%**, by weight**.

Comment 34:

Paragraph D.2.6, Sulfur Dioxide Emissions and Sulfur Content, Subparagraph (a) should be amended to read: Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed 0.25% by weight by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or

(2) (No changes to Subparagraph (2) are requested.)

Response 34:

Condition D.2.6(a) (now D.2.5(a)) has been revised in response to this comment and as explained in IDEM Change 49 as follows:

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the ~~fuel oil~~ sulfur **dioxide emissions do** ~~content does~~ not exceed five-tenths ~~percent (0.5%) by weight by~~ **(0.5) pounds per million Btu heat input and** twenty-five hundredths percent (0.25%) by weight **by**:

(1) Providing vendor analysis of fuel delivered, if accompanied by a **vendor** certification; **or**

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would

be required upon filling~~; or~~.

Comment 35:

Paragraph D.2.8, Record Keeping Requirements, should be amended to read:

(a) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below.

(1) Quarterly compliance dates;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the Permittee, that records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications.

(5) The name of the fuel supplier.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, or measurement, or report. Support information, when applicable, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all related reports required by this permit.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain records of daily visible emission observations of each boiler's stack exhaust.

(c) (No changes are requested to Subparagraph (c).)

Reasons-Changes were made for clarification.

Response 35:

Condition D.2.8(a)(6) (now D.2.7(a)(6)) cannot be removed because it is essential to documenting compliance with 326 IAC D.2.3. Condition D.2.8(a)(1) (now D.2.7(a)(1)) will not be changed because the existing wording is accurate and clear. Pursuant to 326 IAC 7-2-1(a)(1), the emission rates must be maintained by the source owner or operator. Therefore, IDEM, OAQ requests the certification in Condition D.2.8(a)(3) (now D.2.7(a)(3)) be signed by the owner or operator. Condition D.2.8(b) (now D.2.7(b)) is revised in response to this comment and as explained in IDEM Change 51 as follows:

(b) To document compliance with Condition **D.2.6** ~~D.2.7~~, the Permittee shall maintain records of ~~daily~~ visible emission notations of ~~the~~ **each** boiler**'s** stack~~s~~ exhaust **once per shift**.

Comment 36:

Paragraph D.2.9, Reporting Requirements, should be amended to read: If back-up fuels (alternate fuels) are used in the boilers, the natural gas fired boiler certification, shall be submitted to the address listed in Section C – General Reporting Requirements, using the certification form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

Reasons - Reporting is prompted by the use alternate fuels, like fuel oil, that are dirty when compared to natural gas.

Response 36:

Even if only natural gas is used, the Permittee must submit the Natural Gas Fired Boiler Certification semi-annually. The Permittee will certify that all fuel combusted was natural gas. The Natural Gas Boiler Certification is required only semi-annually. Condition D.2.9 (now D.2.8) has been revised in response to this comment and as explained in IDEM Change 52 as follows:

D.2.~~8~~ **9** Reporting Requirements

The natural gas fired boiler certification, shall be submitted **semi-annually** to the address listed in Section C - General Reporting Requirements, using the certification form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the ~~quarter~~ **six month period** being reported. **The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

Comment 37:

The following statement should be added to the paragraph entitled "Emission Limitations and Standards [326 IAC 2-8-4(1)]" as follows:

2. Specific Federally Enforceable Operating Condition

(a) It is a federally enforceable condition of this permit that fuel oil will only be used in these facilities when natural gas is not available for use due to cause outside the control of the Permittee.

Reasons - By adding this federally enforceable condition, PTE for these facilities must be determined using only natural gas.

Response 37:

This requested change does not eliminate the possibility of using fuel oil in the boilers. Therefore, the boilers may still use fuel oil under certain circumstances. There is no change to the permit as a result of this comment.

Comment 38:

The text appearing in the box under "Facility Description [326 IAC 2-8-4 (10)]" should be amended to read:

(f) One (1) abrasives blast booth, identified as s.b.1, constructed in 1981, equipped with separate nozzles for aluminum oxide grit, glass beads, other abrasive material and a baghouse for particulate matter control, exhausting through stack 5, and having a maximum capacity of 3,578 pounds per hour of aluminum oxide 20 grit, or 1994 pounds per hour of glass beads, or 500 pounds per hour of aluminum oxide 150 grit, with an unknown capacity for other abrasive material. This blast booth has the physical constraint on its operation that it can be occupied by only one (1) operator at a time, using only one (1) nozzle and one (1) abrasive media.

Response 38:

See Response 2.

Comment 39:

The text of paragraph D.3.5, Visible Emissions Notations, Subparagraph (a) should be amended to read: Daily visible emissions observations of the abrasives blast booth baghouse stack exhaust shall be performed during daylight and under normal operating conditions for the blasting booth and baghouse when exhausting to the outside atmosphere. A trained employee shall record whether emissions are normal or not.

Reasons - Changes were made to add clarification to the text and to keep it consistent with changes made earlier.

Response 39:

Since "abnormal" means deviating from normal, the word "abnormal" will remain in the condition. Condition D.3.5(a) (now D.3.4(a)) has been revised in response to this comment and as explained in IDEM Change 56 as follows:

(a) ~~Daily~~ Visible emission notations of the ~~sand~~ **abrasives** blast baghouse stack exhaust shall be performed **once per shift** during ~~normal~~ daylight **and under normal operating conditions** ~~operations~~ when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Comment 40:

The text of paragraph D.3.5, Subparagraph (e) should be amended to add a comma (,) between the words troubleshooting and contingency.

Response 40:

Condition D.3.5(e) (now D.3.4(e)) is correct as written. Troubleshooting contingency is one requirement and response steps is another. There is no change to the permit as a result of this comment.

Comment 41:

Paragraph D.3.6, Parametric Monitoring, should be amended to read: The Permittee shall record the total static pressure drop across the abrasives blast booth baghouse, at least once weekly when the blasting processing is in operation. The pressure drop across the baghouse shall be maintained within the range of 2.5 and 5.0 inches of water or a range established during the latest stack test, except when operating under conditions specified in the Compliance Response Plan. The Compliance Response Plan for this emissions unit shall contain troubleshooting, contingency and response steps to correct any condition causing the pressure reading to be outside of the above range for any one reading.

The instrument(s) used for determining the pressure shall comply with Section C – Pressure Gage Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Reasons - Changes were made to add clarification to the text and to keep it consistent with changes made earlier. There are no vents on the abrasives blast booth baghouse that can be redirected. Air emissions are to the outside atmosphere.

Response 41:

Condition D.3.6 (now D.3.5) has been revised in response to this comment and as explained in IDEM Change 57 as follows:

D.3.~~6~~ **5** Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the ~~sand~~ **abrasives** blasting, at least once ~~weekly~~ **per shift** when the ~~sand~~ **abrasives** blasting process is in operation ~~when venting to the atmosphere~~. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of **2.5** ~~4.0~~ and **5.0** ~~6.0~~ inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Comment 42:

The text of paragraph D.3.7, Baghouse Inspections, should be amended to read: An inspection shall be performed each calendar quarter of all baghouse bags that control emissions from the abrasives blasting operation. All defective bags shall be repaired or replaced.

Response 42:

Since the abrasive blasting baghouse stack exhaust can not be redirected, Condition D.3.7 (now D.3.6) has been revised as follows:

D.3.~~7~~ **6** Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the ~~sand~~

abrasives blasting operation ~~when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors.~~ All defective bags shall be replaced.

Comment 43:

The text of paragraph D.3.8, Broken Bag or Failure Detection, Subparagraph (a) should be amended by replacing the word "units" by the word "bags" in the first (1st) sentence; by moving the words "shall be initiated" so that they follow the word "steps" in the second (2nd) sentence; and by deleting the words "with corresponding response steps" and "timetable" from the third (3rd) sentence. The word "blasting" should be added to the beginning of the third (3rd) sentence, in front of the word "Operations."

In Subparagraph (b) the word "units" should be replaced by the word "bags" in two (2) places in the first (1st) sentence. The word "blasting" should be added to the first (1st) sentence, between the words "associated" and "process," and at the beginning of the second (2nd) sentence in front of the word "Operations."

Response 43:

Condition D.3.8 (now D.3.7) has been revised as explained in IDEM Change 58. The failures can be to the baghouse unit and not to the bag itself. Therefore, the requested changes have not been made.

Comment 44:

The text of Paragraph D.3.9, Record Keeping Requirements, Subparagraph (a) should be amended to read: To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emissions observations of the abrasives blast booth baghouse stack exhaust.

Response 44:

Condition D.3.9(a) (now D.3.8(a)) has been revised in response to this comment and as explained in IDEM Change 59 as follows:

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of ~~daily~~ visible emission notations of the ~~facility~~ **abrasives blast booth baghouse** stack exhaust **once per shift**.

Comment 45:

The text of paragraph D.3.9, Subparagraph (b), lines (3), (5), (7) should be amended to read as follows below. Line (8) should be deleted because it does not apply.

(3) Operation and preventative maintenance logs, and maintenance work requests shall be maintained.

(5) Written Standard Operating Procedures (SOP) for the proper operation of the abrasives blast booth.

(7) Written equipment "troubleshooting" procedures for the abrasives blast booth baghouse included in the Preventative Maintenance Plan.

Response 45:

Condition D.3.9(b) (now D.3.8(b)) has been revised as explained in IDEM Change 60. The conditions in question have been removed from the permit. Condition D.3.9(b)(8) is removed in response to this comment as follows:

~~(8) Documentation of the dates vents are redirected.~~

Comment 46:

The text of Paragraph D.3.9, Subparagraph (c) should be amended to read: To document compliance with condition D.3.1, the Permittee shall maintain records of the results of the inspections required under Condition D.3.7.

Comments- Changes were made to add clarification to the text and to keep it consistent with changes made earlier. There are no vents on the abrasives blast booth baghouse that can be redirected. Air emissions are to the outside atmosphere.

Response 46:

Condition D.3.9(c) (now D.3.8(c)) has been revised as follows:

(c) To document compliance with Condition D.3.1, the Permittee shall maintain records of the results of the inspections required under Condition **D.3.6** ~~D.3.7 insert appropriate number for Baghouse Inspection condition and the dates the vents are redirected.~~

Comment 47:

The following statement should be added to the paragraph entitled "Emission Limitations and Standards [326 IAC 2-8-4(1)]" as follows:

D.3 Specific Federally Enforceable Operating Condition

(a) It is a federally enforceable condition of this permit that:

(1) Only one (1) operator will occupy the abrasives blast booth during blasting operations, and

(2) The operator will only use one (1) nozzle and one (1) abrasive media at one time, and

(3) The abrasives blast booth baghouse is an integral part of this facility and will be in operation when the blast booth is in operation.

Reasons - These federally enforceable conditions make the physical constraints of the blast booth, and the baghouse an integral part of the facility. PTE for PM must be determined based on the constraints and as emitted from the baghouse.

Response 47:

See Response 2. The request in (3), "The abrasives blast booth baghouse ... will be in operation when the blast booth is in operation," is satisfied by Condition D.3.4 (now D.3.3) which has been revised in response to these comments and as explained in IDEM Change 55 as follows:

D.3.~~4~~ **3** Particulate Matter (PM)

In order to comply with D.3.1, the baghouse for PM control shall be in operation at all times when the ~~sand~~ **abrasives** blast facility is in operation ~~and exhausting to the outside atmosphere~~.

Comment 48:

The text appearing in the box under "Facility Description [326 IAC 2-8-4 (10)] – Insignificant Activities" should be amended to read:

(a) One (1) boiler, identified as b3, constructed in 1963, fired by natural gas and with a maximum capacity of 1.0 million British Thermal Units per hour.

(b) The following operations related to manufacturing activities that discharge or can be expected to discharge air emissions to the outside atmosphere, but not the emission of HAPs: brazing, welding and cutting and soldering.

(c) Grinding and machining operations that discharge or can be expected to discharge air emissions to the outside atmosphere; controlled with fabric filters or scrubbers, or mist collectors, or wet collectors or electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and an air flow rate less than or equal to 4,000 cubic feet per minute; deburring, buffing, polishing, abrasive blasting, and woodworking.

(d) (No amendment is requested to Subparagraph (d).)

Response 48:

See Response 3.

Comment 49:

The text is of Paragraph D.4.2, Particulate Matter (PM) [326 IAC 6-3], first (1st) sentence should be amended to read: Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Insignificant Activities identified in lines (b), (c), and (d) in the box above shall each not exceed the allowable PM emission rate based on the following equation:

Reasons - Changes were made to add clarification to the text and to keep it consistent with changes made earlier.

Response 49:

Since Condition D.4.2 contains a specific and accurate representation of the emission units subject to 326 IAC 6-3-2, there are no changes to the permit as a result of this comment.

Comment 50:

In addition to those comments made to the actual FESOP draft, the following comments are directed toward the Technical Supporting documents and Appendix A:

(a) Source Name should read Roots Division, Dresser Equipment Group, Inc.

(b) In the section titled "Permitted Emission Units and Pollution Control Equipment," the same changes stated in Comment 2 apply.

(c) The following should be changed under "Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR:"

(1) See Comment 2(c) for section (d)

(2) Under section (f), the capacity of aluminum oxide 150 grit should be 500 pounds per hour.

(d) The following changes should be made to "Insignificant Activities:"

(1) On item (b), the words "using no. 2 fuel oil as a backup fuel" should be omitted as this boiler is not capable of operating on fuel oil.

(2) The following changes should be made under "Potential Emissions:"

(3) The numbers in the chart for potential emissions have changed based on the calculations after new coatings, cleaners, and emissions factors were considered. See attached Appendix A information. The new data is as follows:

Pollutant	Potential Emissions
PM	188.34
PM10	188.34
SO_2	99.7
VOC	34.56
CO	same
NO_x	60.1
Glycol Ethers	2.07
HAPs	6.51
Propylene Glycol	none in new vendor coatings

The changes in calculations are described below:

- PM and PM_{10} were found by adding the recalculated sandblasting emissions based on glass beads having an emission factor of 0.01; the re-calculated PM for the water reducible coatings from D & L Industrial Finishes; the fuel oil PM's for boilers 1 and 2; and the natural gas PM for b3 (which can not possibly operate on fuel oil). For more information on why the emission factor for glass bead was changed, see Appendix A changes, page 20 of this letter. Also, because of the design of paint booth 1, it is possible to paint with two guns simultaneously, so the emissions for paint booth 1 were doubled. (this same situation was included in all PTE calculations for paint booth 1)

- SO_2 PTE was changed slightly by using the natural gas emissions for b3 instead of the fuel oil emissions.

- The VOC PTE was calculated using the water reducible coatings from our new vendor.

- Glycol Ether PTE was calculated by adding the glycol ether of the cleaners R.T.U. Roots Clean and Citrisolv, and the glycol ether content of the red oxide (brush and spray).

- Total HAPS is found by adding the HAPs from the coatings, the boilers and the glycol ether in the RTU Roots Clean cleaner.

- In item (b) under this section, it is stated that "the source has agreed that the PTE of any single HAP may in actuality be greater that 10 tons/year using the existing equipment" because of various size blowers. We do not agree. It is true that in each booth various size blowers are painted, however, the emissions won't necessarily go up with a larger unit. The paint gun is still putting out the same amount of paint whether it paints one large unit over several hours or several small ones in the same period. So the emissions will stay constant when the paint booth is in operation. Based on the new coatings, the PTE will still be below 10 tpy.

(e) The following changes should be made to the section titled "Actual Emissions:"

The information contained in this chart should include only the current coatings being used. It is important to have the actual and potential emissions based on current conditions to avoid confusion and represent the actual circumstances at the facility. The table in the Permit Writer's Supporting Documents should be changed as follows:

Pollutant	Actual Emissions (tons/year)
PM	13.27
PM10	13.27
SO2	.09
VOC	11.62
CO	12.85
NOx	15.00
HAP (total)	2.89

- Actual emissions for Particulate Matter were found by the following method:
  - Paint booth operations were calculated by using the appropriate number of shifts for each booth (p.b.1-2, p.b.2-2, p.b.3-1) and the approximate number of days worked (300) per year.
  - Actual emissions for abrasive blasting were based on Aluminum Oxide emissions after controls, working one 8 hour shift, 300 days/year.
  - Boiler particulate matter calculations include emissions using natural gas working 250 days/year for b2 (heating), 100 days/year for b1 (testing), and 250 days/year for b3.
- Actual emissions for SO_2, CO, and NOx were calculated using natural gas in boilers 1,2, and 3 for the same time periods listed above.
- Actual emissions for VOC were determined as follows:
  - Paint Booth VOC emissions used the number of shifts worked (p.b.1-2, p.b.2-2, p.b.3-1) for 300 days/year. (1 shift = 8 hours)
  - Cleaner VOC's were based on usage 300 days/year
  - Boiler actual VOC emissions were found using natural gas for 250 days/year for b2 (heating), 100 days/year for b1 (testing), and 250 days/year for b3.
- Actual HAP totals were found by adding the following HAP emissions:
  - Paint booth HAP emissions were calculated by using the HAP content of our new water reducible coatings for normal operations 300 days/year. (see page 2 Appendix B of this document)
  - Cleaner HAP emissions includes the two cleaners that contained glycol ethers. (See page 3 Appendix B of this document)
- The actual emissions data associated with the combustion process are standard and will not change, however it should be noted that both boilers do not operate continuously year round on which those numbers are based.

(f) The" Limited Potential to Emit" chart should look as follows based on the information from the new water reducible coatings:

	Limited Potential To Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NOx	HAPs
Surface coating (p.b. 1, p.b. 2, and p.b. 3)	2.59	2.59	0.00	9.48	0.00	0.00	6.51

Two (2) boilers (b1 and b2)	9.09	9.09	97.7	2.11	32.6	55.1	.732
Sandblasting (s.b.1)	26.5	26.5	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.0	5.0	2.0	15.0	1.0	5.0	2.69
Total Emissions	43.18	43.18	99.7	26.59	33.6	60.1	9.932

(g) The following are changes to the section "Compliance Requirements:"

(1) Item (a) (2) should be changed to reflect the Comment 29.

(2) Item (c)(2) should have a baghouse range of 2.5 to 5.0 inches of water. This is consistent with manufacturer's recommendation and actual operating practice.

(h) The following changes have been made to "Appendix A" documents (see attached pages 1 through 4 of TSD Addendum Appendix B):

(1) Page 1, the chart titled VOC and Particulate from Surface Coatings, has been changed to reflect the new water reducible coatings.

(2) Page 2, the chart titled HAP Emissions, has been changed to reflect the total HAP emissions from the new water reducible coatings, not just the glycol ether emissions.

(3) Page 3, the chart titled VOC and Particulate from Solvent Cleaner Operations, has been modified to include two additional cleaners and correct information on the existing cleaners.

(4) Page 4, the chart titled Abrasive Blasting, has been changed to reflect the correct potential and actual emissions for glass bead by using the appropriate emission factor of .010, not the sand emission factor of 0.41. In comparison, the glass bead, which is an amorphous solid with no crystalline structure, does not fracture like sand or Aluminum Oxide and is not likely to make as much dust. In fact, Aluminum oxide has been given a factor of 0.01 by the permit writer. The glass bead should have an emission factor comparable to that of Aluminum Oxide, or smaller, which puts it in the "other" category instead of the "sand" category.

(5) Page 5 no change.

(6) Page 6 should not have b3 as a source under alternate operating scenarios. This boiler can not be operated on fuel oil.

(7) Page 7 no change.

Response 50:

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired

result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The Technical Support Document, therefore, is not amended. This comment has been reviewed to assure that all necessary changes have been made to the permit. The spreadsheets supplied by the applicant for calculating potential and actual emissions in this comment are attached as pages 1 through 4 of TSD Addendum Appendix B.

On March 21, 2001, Bradley L. Anno of Roots Division, Dresser Equipment Group, Inc. submitted an additional comment on the proposed FESOP. The comment is as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Comment 51:

The responsible official will change from Robert Morrison to Gary Redelman.

Response 51:

IDEM, OAM, now only requires that an authorized individual is mentioned in Section A.1. The authorized individual in Section A.1 is revised as follows.

~~Responsible Official~~ **Authorized Individual**: ~~Robert P. Morrison~~ **Gary Redelman**

Upon further review, the OAQ has decided to make the following change to the FESOP (The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**):

Change 1:

The title of Condition C.13 (now C.14) has been corrected as follows:

C.14 Pressure Gauge Specifications ~~Modify for other instruments~~

Change 2:

The name of IDEM's "Office of Air Management" was changed to "Office of Air Quality" on January 1, 2001. All references to "Office of Air Management" in the permit have been changed to "Office of Air Quality" and all references to "OAM" have been changed to "OAQ."

Change 3:

In Section A.1 (General Information), "County status" has been changed to "source location status" and the responsible official is changed as indicated in Response 51.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary industrial and commercial blower and fan manufacturing source.

~~Responsible Official~~ **Authorized Individual**:	~~Robert P. Morrison~~ **Gary Redelman**
Source Address:	900 West Mount Street, Connersville, Indiana 47331
Mailing Address:	900 West Mount Street, Connersville, Indiana 47331
SIC Code:	3564
~~County~~ **Source** Location **Status**:	Fayette
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

Change 4:

Condition B.2 (Definitions) has been revised to clarify the definitions to which it is referring:

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, ~~any~~ **the** applicable definitions found in **the statutes or regulations** (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

Change 5:

In Condition B.3 (Permit Term), language has been added to clarify that amendments, revisions or modifications do not extend the expiration date of the permit. The expiration date will always be five (5) years from the issuance date of the original permit. The expiration date will now be typed in the signature box as well.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the ~~effective~~ **original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

Change 6:

Condition B.4(b) has been deleted and combined with B.4(a).

B.4 Enforceability [326 IAC 2-8-6]

~~(a)~~ **Unless otherwise stated,** all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, **the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.**

~~(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.~~

Change 7:

In Condition B.8 (Duty to Supplement and Provide Information), language has been added to clarify what types of documents must be certified by the authorized individual. Condition B.8(c) has been revised to clarify the procedures for a claim of confidentiality. The condition has been reworded to match the language in the rule.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]**[326 IAC 2-8-5(a)(4)]**

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. **The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-8-4(5)(E)]**

(c) ~~Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the~~ **The** Permittee ~~wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17~~ **may include a claim of confidentiality in accordance with 326 IAC 17.** ~~If requested by IDEM, OAQ, or the U.S. EPA, to~~ **When** furnish**ing** copies of requested records directly to U. S. EPA, ~~and if~~ the Permittee ~~is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with~~ **may assert** a claim of confidentiality ~~under~~ **in accordance with** 40 CFR 2, Subpart B.

Change 8:

In Condition B.10 (Compliance with Permit Conditions), language has been changed because conditions that are not federally enforceable may not constitute a violation of the Clean Air Act. Condition B.10(c) has been added to clarify that an emergency does constitute a defense in an enforcement action if the Permittee complies with the emergency procedures. In order to track the FESOP rules instead of the Title V rules, "constitutes a violation of the Clean Air Act and" has been removed from this condition.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any pro-

visions of this permit ~~constitutes a violation of the Clean Air Act and~~ is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Condition B, Emergency Provisions.

Change 9:

Condition B.11 (Certification) has been revised since there are currently no certifications that would not be required to be certified by the Authorized Individual. Condition B.11(b) has been modified to clarify when a certification is needed.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted ~~under this permit~~ shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit,~~ shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification**.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

Change 10:

Condition B.12 (Annual Compliance Certification)(a) has been revised to clarify that the initial certification is from the date of issuance until December 31. The word “appropriate” has been added to B.12(c)(1). There is a non-rule policy document (NRPD) for annual compliance certifications which was intended to clarify the requirements of 326 IAC 2-8-5(a)(1). The revision in B.12(c)(1) was made to help clarify the intent which is covered in the NRPD. As part of the U.S. EPA’s 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from “continuous or intermittent compliance” to “based on continuous or intermittent data” The U.S. District Court of Appeals, Washington D.C. ruled against EPA’s language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used. (NRDC vs. EPA, #97-1727) This change has been made to this permit to be consistent with state and federal law. The language in 326 IAC 2-8-5(a)(1)(C)(iii) has been and will remain “continuous or intermittent compliance”.

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. **The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent** ~~The~~ certification**s** shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The **appropriate** identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Change 11:

In Condition B.13 (Preventive Maintenance Plan), language has been added to clarify that the PMP and the PMP extension request do not need to be certified by the authorized individual. "Preventive Maintenance Plans" has been replaced with "PMPs" throughout the condition, since it has already been defined. In Condition B.13(c), language was added that says the source has a reasonable time to provide a PMP when IDEM, OAQ requests it. Also, the record keeping requirements have

been added to this condition.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP**s**) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s), by name, position, or job description, responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; **and**

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond ~~it's~~ **the Permittee's** control, the PMP**s** cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the ~~Preventive Maintenance Plans~~ **PMPs** as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement a PMP** does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) **A copy of the** PMP's shall be submitted to IDEM, OAQ, upon request **and within a reasonable time,** and shall be subject to review and approval by IDEM, OAQ. **IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

Change 12:

In Condition B.14 (Emergency Provisions), a reference to the Emergency Occurrence Report Form has been added to B.14(b)(5). The emergency form is for emergencies only, and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. Paragraph (d) part of the first sentence has been deleted. Since

we know it is a FESOP source, then we also know the malfunction rule has been superceded by the emergency rule. In Paragraph (f), “compliance” has been changed to “accordance.”

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent** ~~notice~~, either ~~in writing~~ **by mail** or facsimile~~, of the emergency~~ to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof that an emergency occurred.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

Change 13:

Condition B.15(b)(3) (Deviations from Permit Requirements and Conditions) has been revised to be consistent with Condition B.13. Condition B.15 (Deviations from Permit Requirements and Conditions) no longer requires sources to report deviations in ten (10) days. Now they will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation.~~ **using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.**

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3)~~**(2)** Failure to implement elements of the Preventive Maintenance Plan unless ~~lack of maintenance~~ **such failure** has caused or contributed to a deviation.

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

~~(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified~~

~~by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

Change 14:

In Condition B.16 (Permit Modification, Reopening, Revocation and Reissuance, or Termination), language has been added to clarify that a request to re-open or revoke the permit must be certified by the authorized individual, since these are decisions/ actions that will change the status of the source.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] **The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

Change 15:

In Condition B.17 (Permit Renewal), language has been added to clarify that an application to renew the permit must be certified by the authorized individual.

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in

326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). **The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

Change 16:

Condition B.18 (Permit Amendment or Modification) (a) has been revised because a source is not liable for both a permit violation and a rule violation. By changing this language, the condition is merely referencing the requirements and not mandating compliance with it. 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official, therefore Condition B.18 (Permit Amendment or Revision) is revised to clarify that. EPA has also requested this change.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) ~~The Permittee must comply with~~ **Permit amendments and revisions are governed by** the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). ~~only if a certification is required by the terms of the applicable rule~~.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

Change 17:

Condition B.19 (Permit Revision Under Economic Incentives and Other Programs) has been removed from the permit.

~~B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]~~

~~Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.~~

Change 18:

Condition B.20 and B.21 refer to the same rule and it makes more sense for them to be combined. Condition B.20 (Changes Under Section 502(b)(10) of the Clean Air Act) is removed from the permit and Condition B.21(b) (now B.19(b)) (Operational Flexibility) is revised. The rule cite in (a)(2) was changed to reference 326 IAC 2-8-11.1.

~~B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]~~

~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:~~

~~For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.~~

B.~~21~~**19** Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC ~~2-1.1~~ **2-8-11.1** has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) ~~For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~ **The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:**

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

Change 19:

Condition B.22 (now B.20) (Construction Permit Requirement) has been revised to address the correct rules for construction at a FESOP source. It was also revised because a source is not liable for both a permit violation and a rule violation.

B.~~22~~**20** ~~Construction~~ Permit **Revision** Requirement [326 IAC **2-8-11.1**]

~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997,~~ **A** modification, construction, or reconstruction ~~shall be approved as required by and in accordance with~~ **is governed by** ~~the applicable provisions of~~ **326 IAC 2 and** 326 IAC 2-**8-11.1**.

Change 20:

In order to clarify confidentiality Condition B.23 (now B.21) (Inspection and Entry) has been revised. OAQ also determined that subpart (1) and (2) of paragraph (e) were unnecessary, therefore they have been deleted.

B.~~23~~**21** Inspection and Entry [326 IAC 2-8-5(a)(2)] **[IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such,** the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions

related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. Copies and/or results from the use of this equipment will be provided to the Permittee within a reasonable time period after written request to IDEM.~~[326 IAC 2-8-5(a)(4)]~~

~~(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~

~~(2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

Change 21:

326 IAC 2-8-3(d) requires all applications to be certified by the authorized individual, therefore this Condition B.24 (now B.22) (Transfer of Ownership or Operational Control) has been revised to clarify that requirement.

B.~~24~~**22** Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does ~~not~~ require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

Change 22:

A rule cite has been added to Condition B.25 (now B.23) (Annual Fee Payment).

B.~~25~~**23** Annual Fee Payment **[326 IAC 2-7-19]** [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. **Pursuant 326 IAC 2-7-19(b),** if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

Change 23:

Condition B.26 (Enhanced New Source Review) has been deleted since there is no longer a rule for Enhanced New Source Review and all unpermitted facilities have been constructed and operated.

~~B.26 Enhanced New Source Review [326 IAC 2]~~

~~The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.~~

Change 24:

Condition C.2 (Opacity) has been revised to correctly reflect the rule language.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary ~~Exemptions~~ **Alternative Opacity Limitations**), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Change 25:

Condition C.4 (Incineration) has been revised to specify that 326 IAC 9-1-2 is not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. **326 IAC 9-1-2 is not federally enforceable.**

Change 26:

Condition C.6 (Operation of Equipment) has been revised since there may be control devices that are not required to be used to assure compliance with emission limitations.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule, or in this permit, ~~All~~ **all** air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Change 27:

In Condition C.7 (Stack Height), language has been added to clarify which parts of 326 IAC 1-7 are not federally enforceable.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. **The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.**

Change 28:

Condition C.8 (Asbestos Abatement Projects) paragraph (e) has been revised to more accurately reflect the rule and the rule cite in the title was changed to make the condition more generalized.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] ~~[40 CFR 61.140]~~ **[40 CFR 61, Subpart M]**

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the **applicable** emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are ~~mandatory~~ **applicable** for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

Change 29:

Condition C.9 (Performance Testing) has been revised to specify the locations of applicable procedures and analysis methods for performance testing. This condition has been rearranged for clarity. Language has also been added to indicate that the test protocol and the notification of the test date

do not require certification by the authorized individual.

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. ~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~ **The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(b)~~**(c) Pursuant to 326 IAC 3-6-4(b), all** ~~All~~ test reports must be received by IDEM, OAQ ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by the ~~Commissioner~~ IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

~~The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

Change 30:

Condition C.10 (Compliance Requirements) is a new condition that refers to IDEM's general compliance authority in 326 IAC 2-1.1-11. This is a new section inserted between Testing Requirements and Compliance Monitoring Requirements. This condition will replace the D section condition that was used when no testing is required.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Change 31:

Condition C.10 (now C.11) (Compliance Monitoring) has been revised to clarify when compliance monitoring (CM) must begin. New emission units must begin compliance monitoring upon start-up. Existing units should continue any already required compliance monitoring, but have 90 days to start any CM that has been added as a result of TV review. There are times when compliance monitoring is required by a Maximum Achievable Control Technology (MACT) that the source does not have to comply with yet. Therefore, language has been added to clarify that the permit will specify when CM doesn't have to start in 90 days. The same idea applies to new units, if the MACT doesn't apply yet, we would not expect the source to start compliance monitoring.

C.~~10~~**11** Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

~~Compliance with applicable requirements shall be documented as required by this permit~~. **Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D,** the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment ~~no more than ninety (90) days after receipt of this permit~~. If due to circumstances beyond its control, ~~this schedule cannot be met~~ **that equipment cannot be installed and operated within ninety (90) days**, the Permittee may extend the compliance schedule **related to the equipment for** an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

Change 32:

In Condition C.11 (now C.12) (Maintenance of Monitoring Equipment), the instructions have been revised to show that this option should be used not only for Continuous Emission Monitoring (CEMs) but also for any monitoring equipment.

C.~~11~~**12** Maintenance of **Emission** Monitoring Equipment [[326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the **emission** monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less **often** than **once per** ~~one (1)~~ hour ~~this time frame is determined on a case by case basis~~ until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

Change 33:

Condition C.12 (now C.13) (Monitoring Methods) has been revised to clarify that the monitoring and testing requirements are located in Section D of the permit. Rule cites have also been added.

C.~~12~~**13** Monitoring Methods [326 IAC 3] **[40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed **required by Section D** ~~to meet the applicable requirements~~ of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B, 40 CFR 63**, or other approved methods as specified in this permit.

Change 34:

Rule cites have been added to Condition C.13 (now C.14) (Pressure Gauge Specifications).

C.~~13~~**14** Pressure Gauge Specifications **[326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

Change 35:

Condition C.14 (now C.15) (Risk Management Plan) (b) was removed because it is repetitive of (a)(2) (now (b)). They both required the same thing, and the source does not need to separately certify Risk Management Plan compliance. If a source is subject to 40 CFR 68, they should have already submitted a Risk Management Plan. Therefore, Condition C.14(a)(3) has been removed.

C.~~14~~**15** Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall **submit**:

~~(a) Submit:~~

~~(1)~~**(a)** A compliance schedule for meeting the requirements of 40 CFR 68 ~~by the date provided in 40 CFR 68.10(a)~~; or

~~(2)~~**(b)** As a part of the **annual** compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

~~(3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.~~

~~(b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.~~

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Change 36:

Condition C.15 (now C.16) (Compliance Monitoring Plan - Failure to Take Response Steps) (c)(1) has been revised to clarify the intent. Condition C.17 is now incorporated into this condition. Grammatical changes were also made.

C.~~15~~**16** Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5] ~~[326 IAC 1-6]~~

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. **The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the** ~~This~~ compliance monitoring plan ~~is comprised of~~ **are:**

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) **Reasonable** response steps that **may** ~~will~~ be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking **reasonable** ~~such~~ response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, ~~appropriate~~ **reasonable** response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure ~~to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan~~ **to take reasonable response steps** ~~shall~~ **may** constitute a violation of the permit. ~~unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~

(c) ~~After investigating the reason for the excursion,~~ **Upon investigation of a compliance monitoring excursion,** the Permittee is excused from taking further response steps for any of the following reasons:

(1) ~~The monitoring equipment malfunctioned, giving a false reading.~~ **A false reading occurs due to the malfunction of the monitoring equipment.** This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; ~~or~~

(3) An automatic measurement was taken when the process was not operating; ~~or~~

(4) The process has already returned **or is returning** to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

Change 37:

Condition C.16 (now C.17) (Actions Related to Noncompliance Demonstrated by a Stack Test) has been revised. References to "corrective actions" have been changed to "response actions" to be consistent with the rest of the permit.

C.~~16~~**17** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing (Condition C.9), of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate ~~corrective~~ response actions. The Permittee shall submit a description of these ~~corrective~~ response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize **excess** emissions from the affected facility while the ~~corrective~~ response actions are being implemented. ~~IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Change 38:

Condition C.17 (Monitoring Data Availability) has been incorporated into Condition C.18 (Compliance Monitoring Plan- Failure to Take Response Steps).

~~C.17 Monitoring Data Availability~~

~~(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~

~~(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~

~~(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~

~~(d) If for reasons beyond its control, the Permittee fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~

~~(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~

~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) and (b) above.~~

Change 39:

Condition C.18 (General Record Keeping Requirements) has been revised to be more consistent with the rules and to assure sources that they get a "reasonable time" to produce records. Also, "monitoring" was removed so that the condition will seem more generalized to all record keeping and "reports" was added to clarify that the source must keep copies of those as well. Paragraphs (b) and (c) have been removed because they were unnecessary.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required ~~monitoring~~ data, **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years ~~and available upon the request~~. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

~~(b) Records of required monitoring information shall include, where applicable:~~

~~(1) The date, place, and time of sampling or measurements;~~

~~(2) The dates analyses were performed;~~

~~(3) The company or entity performing the analyses;~~

~~(4) The analytic techniques or methods used;~~

~~(5) The results of such analyses; and~~

~~(6) The operating conditions existing at the time of sampling or measurement.~~

~~(c) Support information shall include, where applicable:~~

~~(1) Copies of all reports required by this permit;~~

~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~

~~(3) All calibration and maintenance records;~~

~~(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

~~(d)~~**(b) Unless otherwise specified in this permit,** all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Change 40:

Condition C.19 (General Reporting Requirements) (d) has been revised so that it is clear that the reports it refers to are the ones required by section D. There has been a lot of confusion between C.19(a) and (d); (a) is referring to the Compliance Monitoring Report found in the back of the permit and (d) is referring to the quarterly reports which are required in Section D. The Quarterly Compliance Monitoring Report in the back of the permit is now the Quarterly Deviation and Compliance

Monitoring Report. Condition C.19(g) (now C.19(e)) has been revised to clarify that quarterly and semi-annual reports are based on calendar years, not on when the permit is issued. For example if a source is issued a permit in February, they need to submit their first quarterly report in March. References to the emergency report have been removed, and all the information is in Condition B.13. The report does need to be certified by the responsible official.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] **[326 IAC 2-1.1-11]**

(a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit ~~a~~ **the attached** Quarterly **Deviation and** Compliance Monitoring Report **or its equivalent**. Any deviation from ~~the~~ **permit** requirements, ~~and~~, the date(s) of each deviation**, the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The **Quarterly Deviation and** Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly **or** semi-annual report **required in Section D of this permit** shall be submitted within thirty (30) days of the end of the designated reporting period for that report. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

~~(g)~~**(e)** The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**

Change 41:

In Condition D.1.4 (Particulate Matter), the first equation should not say "extrapolation" because that is not consistent with the rule, and the rule cite has been added to the first paragraph.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the three (3) paint booths (p.b.1, p.b.2 and p.b.3) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Change 42:

Condition D.1.6 (Testing Requirements) has been deleted. The new Condition C.10 (Compliance Requirements) will address situations in which testing is not required.

~~D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]~~

~~The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Change 43:

In Condition D.1.7 (now D.1.6) (Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)) the last sentence has been removed. It is unnecessary because the situation is addressed in Condition C.10 (Compliance Requirements).

D.1.~~7~~ **6** Volatile Organic Compounds (VOC)

Compliance with the VOC content and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. ~~IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

Change 44:

In Condition D.1.9 (now D.1.8) (Particulate Matter (PM)), language has been added to clarify the condition for which the dry filters are needed to show compliance.

D.1.~~9~~ **8** Particulate Matter (PM)

In order to comply with D.1.4, the dry filters for PM control shall be in operation at all times when the three (3) paint booths (p.b.1, p.b.2 and p.b.3) are in operation.

Change 45:

In Condition D.1.12 (now D.1.11) (Reporting Requirements), the required reports should be certified by the responsible official. Part 70 requires all reports to be certified.

D.1.~~12~~**11** Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be

submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. **The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

Change 46:

In Condition D.2.2 (Particulate Matter (PM)), the rule cite has been added.

D.2.2 Particulate Matter (PM) **[326 IAC 6-2-4]**

Change 47:

In Condition D.2.3 (Sulfur Dioxide (SO_2)), language was added to specify how compliance shall be demonstrated. 326 IAC 7-1 is not federally enforceable, therefore the condition should state that.

D.2.3 Sulfur Dioxide (SO_2) [326 IAC 7-1.1-1][326 IAC 2-8] **[326 IAC 7-2-1]**

(a) Pursuant to 326 IAC 7-1.1 (SO_2 Emissions Limitations) the SO_2 emissions from the two (2) boilers when operating on no. 2 fuel oil shall not exceed five tenths (0.5) pounds per million British thermal unit heat input. **Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average. 326 IAC 7-1.1 and 326 IAC 7-2-1 are not federally enforceable.**

(b) In order for the source to remain in compliance with the requirements of 326 IAC 2-8 (FESOP), the sulfur content of the no. 2 fuel oil shall not exceed 0.25%, by weight.

Change 48:

Condition D.2.5 (Testing Requirements) has been deleted. The new Condition C.10 (Compliance Requirements) will address situations in which testing is not required.

~~D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]~~

~~The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Change 49:

Condition D.2.6(a)(1) (now D.2.5(a)(1)) (Sulfur Dioxide Emissions and Sulfur Content) has been revised to be more consistent with the rule. Also, "or" was added to clarify that the source has an option between (1) and (2) for demonstrating that the sulfur dioxide emissions do not exceed 0.5 pound per million British thermal unit and 0.25% Sulfur by weight.

D.2.~~6~~ **5** Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the ~~fuel oil~~ sulfur **dioxide emissions do** ~~content does~~ not exceed five-tenths ~~percent (0.5%) by weight by~~ **(0.5) pounds per million British thermal unit heat input and** twenty-five hundredths percent (0.25%) by weight **by**:

(1) Providing vendor analysis of fuel delivered, if accompanied by a **vendor** certification; **or**

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling~~; or~~.

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the two (2) boilers (b1 and b2), using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to ~~either~~ **any** of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Change 50:

Condition D.2.7(a) (now D.2.6(a)) (Visible Emissions Notations) has been revised to be consistent with the April 22, 1999 Criteria for Determining Compliance Monitoring guidance. In Condition D.2.7(e) (now D.2.6(e)), language about failure to take response steps has been added. This will help clarify that not taking a response step will be considered a permit violation.

D.2.~~7~~ **6** Visible Emissions Notations

(a) ~~Daily~~ Visible emission notations of the boiler stacks (stacks 8 and 9) exhaust shall be performed **once per shift** during normal daylight operations **when no. 2 fuel oil is in use and** when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

Change 51:

Condition D.2.8(b) (now Condition D.2.7(b)) has been revised to be consistent with the April 22, 1999 Criteria for Determining Compliance Monitoring guidance.

D.2.~~7~~ **8** Record Keeping Requirements

(b) To document compliance with Condition **D.2.6** ~~D.2.7~~, the Permittee shall maintain records of ~~daily~~ visible emission notations of each boiler's stack exhaust **once per shift**.

Change 52:

In Condition D.2.9 (now D.2.8) (Reporting Requirements), the required reports should be certified by the responsible official. Part 70 requires that all reports are certified.

D.2.~~8~~ **9** Reporting Requirements

The natural gas fired boiler certification, shall be submitted semi-annually to the address listed in Section C - General Reporting Requirements, using the certification form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six month period being reported. **The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

Change 53:

In Condition D.3.1 (Particulate Matter (PM and PM_{10}), the first equation should not say "extrapolation," and the rule cite has been further specified.

D.3.1 Particulate Matter (PM and PM_{10}) [326 IAC 6-3-**2**][326 IAC 2-8]

(a) Pursuant to 326 IAC 6-3-**2** (Process Operations), the allowable PM emission rate from the abrasives blast facility shall not exceed 6.05 pounds per hour when operating at a process weight rate of 3,578 pounds per hour. This will also result in compliance with 326 IAC 2-8 (FESOP) and make the requirements of 326 IAC 2-2 (PSD) not applicable.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

(b) Any change or modification that increases the process weight rate of the abrasives blast booth to 13.0 tons per hour may result in PM_{10} emissions of 100 tons per year or more and shall require prior approval to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 2-7 (Part 70 Permits).

Change 54:

Condition D.3.3 (Testing Requirements) has been deleted. The new Condition C.10 (Compliance Requirements) will address situations in which testing is not required.

~~D.3.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Change 55:

In Condition D.3.4 (now D.3.3) (Particulate Matter (PM)), language has been added to clarify the condition for which the baghouse is needed to show compliance.

D.3.~~4~~ **3** Particulate Matter (PM)

In order to comply with D.3.1, the baghouse for PM control shall be in operation at all times when the abrasives blast facility is in operation ~~and exhausting to the outside atmosphere~~.

Change 56:

Condition D.3.5(a) (now D.3.4(a)) (Visible Emissions Notations) has been revised to be consistent with the April 22, 1999 Criteria for Determining Compliance Monitoring guidance. In Condition D.3.5(e) (now D.3.4(e)), language about failure to take response steps has been added. This will help clarify that not taking a response step will be considered a permit violation.

D.3.~~5~~ **4** Visible Emissions Notations

(a) ~~Daily~~ Visible emission notations of the abrasives blast baghouse stack exhaust shall be performed **once per shift** during daylight and under normal operating conditions when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

Change 57:

Condition D.3.6 (now D.3.5) (Parametric Monitoring) has been revised to require parametric monitoring once per shift for this facility.

D.3.~~6~~ **5** Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the abrasives blasting, at least once ~~weekly~~ **per shift** when the abrasives blasting process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.5 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Change 58:

Condition D.3.8 (now D.3.7) (Broken Bag or Failed Bag Detection) has been revised to specify the differences is requirements for single compartment baghouses and multi-compartment baghouses.

D.3.~~8~~ **7** Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) **For multi-compartment units,** the affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions).** Within eight (8) **business** hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) **business** hours of discovery of the failure and shall include a timetable for completion. ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~ **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Change 59:

Condition D.3.9 (now D.3.8) (Record Keeping Requirements) has been revised to be consistent with the April 22, 1999 Criteria for Determining Compliance Monitoring guidance. In Condition D.3.9 (now D.3.8) (b)(1)(B) is confusing. Therefore, it has been revised to just require that the source to record whether the cleaning cycle operation is normal. Lines (b)(2) through (7) have been deleted because they are not clearly defined.

D.3.~~9~~ **8** Record Keeping Requirements

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of ~~daily~~ visible emission notations of the abrasives blast booth baghouse stack exhaust **once per shift**.

(b) To document compliance with Conditions D.3.1 and D.3.6, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle **operation.** ~~frequency and differential pressure Will not apply to woodworking baghouses.~~

~~(2) Documentation of all response steps implemented, per event.~~

~~(3) Operation and preventive maintenance logs, including maintenance work requests, shall be maintained.~~

~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~

~~(5) Operator standard operating procedures (SOP) for the proper operation of the abrasives blast booth.~~

~~(6) Manufacturer's specifications or its equivalent.~~

~~(7) Equipment "troubleshooting" contingency plan.~~

(c) To document compliance with Condition D.3.1, the Permittee shall maintain records of the results of the inspections required under Condition **D.3.6** ~~D.3.7~~.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Change 60:

In Condition D.4.2 (Particulate Matter (PM) the first equation should not say “extrapolation,” and the rule cite has been further specified.

D.4.2 Particulate Matter (PM) [326 IAC 6-3**-2**]

Pursuant to 326 IAC 6-3**-2** (Process Operations), the allowable PM emission rate from the manufacturing activities, grinding and machining operations, and the melting of Babbitt bars shall each not exceed allowable PM emission rate based on the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Change 61:

Condition D.4.3 (Testing Requirements) has been deleted. The new Condition C.10 (Compliance Requirements) will address situations in which testing is not required.

~~D.4.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]~~

~~The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Conditions D.4.1 and D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Change 62:

Facility description boxes have been revised to clarify that descriptive information is not federally enforceable. If something about the description should be enforceable then it needs to be contained in a specific D condition. The following language has been added to each box:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Change 63:

Condition D.1.1 has been revised to clarify that the VOC content limitation applies to each paint booth separately:

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the blowers at **each of** the three (3) paint booths (p.b.1, p.b.2 and p.b.3) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Change 64:

Condition D.2.2 has been revised to include the total source operating capacity used to compute the PM limitation:

D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 62.4 million British Thermal Unit per hour heat input boiler (b1) shall be limited to 0.34 pounds per million British Thermal Unit heat input.

This limitation is based on the following equation:

$Pt = 1.09 / Q^{0.26}$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. **(Q = 88.5 MMBtu/hr)**

Change 65:

The lettering of emission units (d) and (c) in Section A.2 and the facility description boxes in Section D.1 and D.2 is reversed for clarity as follows:

~~(c)~~**(d)** One (1) boiler, identified as b2, constructed in 1966, fired by natural gas and using no. 2 fuel oil as a backup fuel, exhausting to stack 9, maximum heat input capacity: 25.1 million British thermal units per hour.

~~(d)~~**(c)** One (1) paint booth, identified as p.b. 2, constructed before 1984, equipped with high volume low pressure (HVLP), air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stack 12, capacity: 9.0 small cast iron blowers per hour with an unknown capacity for various sized blowers.

Change 66:

(a) The choice of affidavit has been added to the Certification form.

(b) Emergency/Deviation Occurrence Report Form is now called the Emergency Occurrence Report. All references to deviations have been removed. These forms should be sent to the Compliance Branch, not the Compliance Data Section. The two (2) day notification to come in without the responsible official certification is allowed as long as the emergencies

are included in the Quarterly Deviation and Compliance Monitoring Report. That report is certified by the responsible official, therefore will comply with the Part 70 requirement to have all reports certified. A statement has been added stating that this form does not require a certification.

(c) The quarterly report and the Natural Gas Fired Boiler Certification will now need to be certified by the responsible official. Therefore the last line in each of these reports will read **Attach a signed certification to complete this report**.

(d) The Quarterly Compliance Monitoring Report, is now called the Quarterly Deviation and Compliance Monitoring Report. The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. Sources are not required to report deviations in ten (10) days. Therefore, every source will need submit this report quarterly. For sources with an applicable requirement which gives an alternate schedule for reporting deviations, those deviations will not need to be reported quarterly, but instead should be reported according to the schedule in the applicable requirement.

(e) To simplify the requirements of Condition D.2.9, the Semi-Annual Boiler Certification is revised as follows:

9	**Natural Gas Only**
9	**Alternate Fuel burned**
	From:_____ **To:**_____

~~**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**~~

~~Report period~~
~~Beginning: _____~~
~~Ending: _____~~

~~Boiler Affected~~	~~Alternate Fuel~~	~~Days burning alternate fuel~~	
		~~From~~	~~To~~

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:

Date:

Attach a signed certification to complete this report.

(f) The Emergency Occurrence Report and Quarterly Deviation and Compliance Monitoring Report are specifically changed as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE ~~DATA SECTION~~ BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY~~/DEVIATION~~ OCCURRENCE REPORT

Source Name: Roots Division, Dresser Equipment Group, Inc.
Source Address: 900 West Mount Street, Connersville, Indiana 47331
Mailing Address: 900 West Mount Street, Connersville, Indiana 47331
FESOP No.: F 041-7130-00010

This form consists of 2 pages **Page 1 of 2**

~~Check either No. 1 or No.2~~

9 ~~1.~~ This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice ~~in writing~~ by mail or ~~by~~ facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

~~9~~ 2. ~~This is a deviation, reportable per 326 IAC 2-7-5(3)(C)~~
- C ~~The Permittee must submit notice in writing within ten (**10**) calendar days~~

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency~~/Deviation~~:
Describe the cause of the Emergency~~/Deviation~~:

If any of the following are not applicable, mark N/A

Date/Time Emergency~~/Deviation~~ started:
Date/Time Emergency~~/Deviation~~ was corrected:
Was the facility being properly operated at the time of the emergency/~~deviation~~? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency~~/deviation~~:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY ~~(or SEMI-ANNUAL)~~ DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Roots Division, Dresser Equipment Group, Inc.
Source Address: 900 West Mount Street, Connersville, Indiana 47331
Mailing Address: 900 West Mount Street, Connersville, Indiana 47331
FESOP No.: F 041-7130-00010

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the ~~compliance monitoring~~ requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the ~~compliance monitoring~~ requirements, ~~and~~ the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. ~~with the following exceptions:~~ Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. ~~This form can be supplemented by attaching the Emergency/Deviation Occurrence Report.~~ If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

~~**Compliance Monitoring**~~ **Permit Requirement** (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

~~**Compliance Monitoring**~~ **Permit Requirement** (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

~~**Compliance Monitoring**~~ **Permit Requirement** (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

~~**Compliance Monitoring**~~ **Permit Requirement** (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

~~**Compliance Monitoring**~~ **Permit Requirement** (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Appendix A: Emission Calculations
Abrasive Blasting

Company Name: Roots Division, Dresser Industries
Plant Location: 900 West Mount Street, Connersville, IN 47331
County: Fayette
FESOP: F 041-7130
Plt ID: 041-00010
Permit Reviewer: CarrieAnn Ortolani
Date: November 12, 1996

Table 1 - Emission Factors for Abrasives

	Emission Factor	
Abrasive	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)
Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

	Nozzle Pressure (psig)							
Internal diameter, in	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	**309**
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	**1265**
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	**2880**
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

	Steel	Sand	Aluminum Oxides
Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)			
FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =	2880	2880	2880
D = Density of abrasive (lb/ft3) From Table 2 =	487	99	160
D1 = Density of sand (lb/ft3) =	99	99	99
ID = Actual nozzle internal diameter (in) =	0.75	0.75	0.75
ID1 = Nozzle internal diameter (in) from Table 3 =	0.75	0.75	0.75
Flow Rate (FR) (lb/hr) =	**14167.273** per nozzle	**2880.000** per nozzle	**4654.545** per nozzle

Uncontrolled Emissions (E, lb/hr)

	Steel	Sand	Aluminum Oxides
EF = emission factor (lb PM/ lb abrasive) From Table 1 =	0.004	0.041	0.010
FR = Flow Rate (lb/hr) =	14167.273	2880.000	4654.545
w = fraction of time of wet blasting =	0 %	0 %	0 %
N = number of nozzles =	1	1	1
Uncontrolled Emissions =	**56.7 lb/hr**	**118 lb/hr**	**46.5 lb/hr**
	248 ton/yr	**517 ton/yr**	**204 ton/yr**
Controlled Emissions (99%) =	**0.567 lb/hr**	**1.18 lb/hr**	**0.465 lb/hr**
	2.48 ton/yr	**5.17 ton/yr**	**2.04 ton/yr**

Emission Factors from Stappa Alapco, Section 3 "Abrasive Blasting"
Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)
E = EF x FR x (1-w/200) x N
w should be entered in as a whole number (if w is 50%, enter 50)

VOC and Particulate
From Surface Coating Operation

Company Name: Roots Division
Address City & ZIP: 900 West Mount Street, Connersville, IN 47331
FESOP: F041-7130
Plt ID: 041-00010
Reviewer: CarrieAnn Ortolani
Date: February 22, 1999

Material	Density	Weight% Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat. for average size (gal/unit)	Number average size units (unit/hr)	Pounds VOC per gallon coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	PM potential tons per year	lb VOC/ gal solids	Transf. Eff.
Paint Booth 1, S/V 1																
Grey 6146	9.2	68.95	59.46	9.49	65.75	22.1	1.0	.33	2.55	.87	.287	6.89	1.26	3.72	2.85	10%
Gloss Black 6252	8.4	77.06	62.74	14.32	63.34	20.0	1.0	.33	3.27	1.20	.396	9.50	.23	2.51	1.92	10%
Flat Black 6069	8.8	73.14	59.34	13.8	58.84	24.6	1.0	.33	3.25	1.21	.399	9.58	1.75	3.09	2.36	10%
Paint Booth 2 S/V 12																
Grey 6146	9.2	68.95	59.46	9.49	65.75	22.1	.06	9.0	2.55	.87	.47	11.28	2.06	6.09	2.85	10%
Gloss Black 6252	8.4	77.06	62.74	14.32	63.34	20.0	.06	9.0	3.27	1.20	.65	15.6	2.85	4.11	1.92	10%
Flat Black 6069	8.8	73.14	59.34	13.8	58.84	24.6	.06	9.0	3.25	1.21	.653	15.67	2.86	5.05	2.36	10%
John Deere Green 6159	8.7	68.69	53.71	14.98	56.26	25.4	.06	9.0	2.98	1.30	.7	16.8	3.07	5.76	2.73	10%
Paint Booth 3 S/V 2																
Red Oxide Spray 6156	8.6	71.13	55.24	15.89	57.48	23.8	1.0	.33	3.23	1.37	.452	10.48	1.91	3.24		10%
Grey 6146	9.2	68.95	59.46	9.49	65.75	22.1	1.0	.33	2.55	.87	.287	6.89	1.26	3.72	2.85	10%
Gloss Black 6252	8.4	77.06	62.74	14.32	63.34	20.0	1.0	.33	3.27	1.20	.396	9.5	.23	2.51	1.92	10%
Flat Black 6069	8.8	73.14	59.34	13.8	58.84	24.6	1.0	.33	3.25	1.21	.399	9.58	1.75	3.09	2.36	10%
Crankcase Sealer (brush)																
Red Oxide (brush)	10.0		53.99	1.92	64.89	32.7	.125	9.0	.54	.19	.214	5.13	.936	0.00	4.42	10%
State Potential Emissions											1.71	41.1	7.51	17.3		

	Controlled VOC lbs/hr	Cont. VOC lbs/day	Cont. VOC tons/yr	Controlled Particulate tons/yr
Controlled Emissions due to Surface Coating Operations and Controls	1.71	41.1	7.51	2.59

Company Name: Roots Division
Address City & ZIP: 900 West Mount Street, Connersville, IN 47331
FESOP: F041-7130
Plt ID: 041-00010
Reviewer: CarrieAnn Ortolani
Date: February 22, 1999

Material	Density	Gal of Mat. for average size (gal/unit)	Number average size units (unit/hr)	Flash off (fraction)	Weight % HAP	HAP Emissions (ton/yr)	Weight % Glycol Ethers	Glycol Ether Emissions (tons/year)
Paint Booth 1, S/V 1								
Grey 6146	9.2	1.0	.33	1.0	5%	.665	0	0
Gloss Black 6252	8.4	1.0	.33	1.0	9%	1.09	0	0
Flat Black 6069	8.8	1.0	.33	1.0	9%	**1.14**	0	0
Paint Booth 2 S/V 12								
Grey 6146	9.2	.06	9.0	1.0	5%	1.09	0	0
Gloss Black 6252	8.4	.06	9.0	1.0	9%	1.79	0	0
Flat Black 6069	8.8	.06	9.0	1.0	9%	**1.87**	0	0
John Deere Green 6159	8.7	.06	9.0	1.0	9%	1.85	0	0
Paint Booth 3 S/V 2								
Red Oxide Spray	8.6	1.0	.33	1.0	11%	**1.37**	**4%**	**.497**
Grey 6146	9.2	1.0	.33	1.0	5%	.665	0	0
Gloss Black 6252	8.4	1.0	.33	1.0	9%	1.09	0	0
Flat Black 6069	8.8	1.0	.33	1.0	9%	1.14	0	0
Crankcase Sealer (brush)								
Red Oxide (brush)	10.0	.125	9.0	1.0	2%	**.986**	**2%**	**.986**
State Potential Emissions				**TOTALS:**	**(tons/yr)**	**6.51**	**6%**	**0.986**
					(lb/hr)	**1.49**		
					(g/sec)	**0.184**		

Company Name: Roots Division
Address City & ZIP: 900 West Mount Street, Connersville, IN 47331
FESOP: F041-7130
Plt ID: 041-00010
Reviewer: CarrieAnn Ortolani
Date: February 22, 1999

Material	Density	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Gal. of Material (gal/day)	Pounds VOC per gallon of coating	Potential VOC Pounds per day	Potential VOC tons per year	Weight % glycol ethers	Glycol Ether Emissions (ton/year)
Wash Booth										
Ripper 1	8.59	100%	80.0%	20%	5.820	1.72	10.01	1.83	0	0
General Clean up										
RTU Roots Clean	8.42	100	60	40	2.200	3.37	7.41	1.35	5	.169
Reliance	8.92	100	50	50	2.2	4.46	9.81	1.79	0	0
Citrusolv	7.68	75%	30	55	3	4.22	12.66	2.31	10	.422
Solsafe	6.68	100%	0	100%	2.0	6.68	13.36	2.44	0	0
Floor Scrubber										
Vantage	8.92	75	50	25%	.533	2.23	1.19	.217	0	0
					State Potential	Emissions	54.4	9.94	15	0.591

Abrasive Blasting
Company Name: Roots Division
Address City & ZIP: 900 West Mount Street, Connersville, IN 47331
FESOP: F041-7130
Plt ID: 041-00010
Reviewer: CarrieAnn Ortolani
Date: February 22, 1999

Table 1- Emissions Factors for Abrasives

	Emission Factor	
Abrasive	lb PM/lb abrasive	lb PM10/lb PM
Sand	.041	.70
Grit	.010	.70
Steel Shot	.004	.86
Other	.010	

Table 2- Density of Abrasives (lb/ft3)

Abrasive	Density
Al oxides	160
Sand	99
Steel	487

Table 3- Sand Flow Rate (FR1) Through Nozzle (lb/hr)
Flow rate of sand through a blasting nozzle as a function of nozzle pressure and internal diameter

	Nozzle Pressure							
Internal Diameter	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
¼	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
¾	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations
Adjusting flow rates for different abrasives and nozzle diameters

	Aluminum Oxide 20 grit	Glass Bead	Aluminum Oxide 150 grit
FR1	2880	1265	309
Density	123	156	105
D1 (density of sand)	99	99	99
ID	.75	.50	.25
ID1	.75	.50	.25
Flow Rate (FR) (lb/hr)	3578.182	1994.61	500
EF= emission factor	.01	**.01 (other, not sand)**	.01
w= fraction of time wet blasting	0	0	0
N=number of nozzles	1	1	1

Uncontrolled Emissions	35.8 lb/hr	19.9 lb/hr	5.00 lb/hr
	157 ton/yr	87.3 ton/yr	21.9 ton/yr
Controlled emissions	0.358 lb/hr	0.199 lb/hr	0.050 lb/hr
	1.57 ton/yr	0.873 ton/yr	0.219 ton/yr

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name:	**Roots Division, Dresser Industries**
Source Location:	**900 West Mount Street, Connersville, Indiana 47331**
County:	**Fayette**
SIC Code:	**3564**
Operation Permit No.:	**F 041-7130-00010**
Permit Reviewer:	**CarrieAnn Ortolani**

The Office of Air Management (OAM) has reviewed a FESOP application from Roots Division, Dresser Industries relating to the operation of an industrial and commercial blower and fan manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) paint booth, identified as p.b. 1, constructed in 1990, equipped with high volume low pressure (HVLP), air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stacks 1A, 1B, 1C, and 1D, capacity: 0.33 large cast iron blowers per hour with an unknown capacity for various sized blowers.

(b) One (1) paint booth, identified as p.b. 3, constructed in 1991, equipped with high volume low pressure (HVLP), air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stack 2, capacity: 0.33 large cast iron blowers per hour with an unknown capacity for various sized blowers.

(c) One (1) boiler, identified as b2, constructed in 1966, fired by natural gas and using no. 2 fuel oil as a backup fuel, exhausting to stack 9, maximum heat input capacity: 25.1 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

(d) One (1) paint booth, identified as p.b. 2, constructed after 1990, equipped with high volume low pressure (HVLP), air assisted airless, or electrostatic spray guns, and dry filters as overspray control, exhausting to stack 12, capacity: 9.0 small cast iron blowers per hour with an unknown capacity for various sized blowers.

(e) One (1) boiler, identified as b1, constructed in 1983, fired by natural gas and using no. 2 fuel oil as a backup fuel, exhausting to stack 8, maximum heat input capacity: 62.4 million British thermal units per hour.

(f) One (1) sand blast booth, identified as s.b. 1, constructed in 1981, equipped with separate nozzles for aluminum oxide 20 grit, glass bead, and aluminum oxide 150 grit and a baghouse for particulate matter control, exhausting through stack 5, maximum capacity: 3,578 pounds per hour of aluminum oxide 20 grit, 1,994 pounds per hour of glass bead, or 327 pounds per hour of aluminum oxide 150 grit.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(b) One (1) boiler, identified as b3, constructed in 1963, fired by natural gas and using no.2 fuel oil as a backup fuel, maximum capacity: 1.0 million British thermal units per hour.

(c) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(d) Machining where an aqueous cutting coolant continuously floods the machining interface.

(e) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF); or

(2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(g) Closed loop heating and cooling systems.

(h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume; Beta System & Service Center.

(i) Quenching operations used with heat treating processes.

(j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment; Smog hogs, paint Booth filters, sandblast book, smoke eaters in break room.

(k) Paved and unpaved roads and parking lots with public access; two parking lots and one drive.

(l) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower; boiler and cooling tower.

(n) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(o) Melting of Babbitt bars to make soft hammers (emissions equal to or less than 0.6 tons per year or 3.29 pounds per day of lead).

(p) The use of general cleanup solvents, usage: 2.20 gallons per day.

(q) The use of floor scrubber solvents, usage: 0.533 gallons per day.

(r) One (1) wash booth, capacity 5.82 gallons of Ripper 1 solvent per day.

(s) Three (3) no. 2 fuel oil storage tanks, constructed in 1975, exhausting through stacks 23 and 24, capacity: 20,000 gallons each.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following: list permits, registrations, modifications, exemptions, etc.

(a) OP 21-09-9-0014, issued on June 24, 1974;

(b) Registration, no number, issued August 13, 1982;

(c) Registration, no number, issued August 10, 1989; and

(d) Registration CP (041) 2011-00010, issued on August 2, 1991.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and prior to receipt of the proper permit or registration. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR.*

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

(c) IDEM is aware that the coating used in the spray booths was previously not in compliance with the following emission limitation:

326 IAC 8-2-9 (Miscellaneous Metal Coating)
Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal trailer shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

(d) The coating is currently in compliance with this rule. IDEM is reviewing this matter and has taken appropriate action.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on November 12, 1996. Additional information was received on August 26, 1997, April 30, 1998, June 25, 1998, July 8, 1998, and September 14, 1998.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 7 of 7).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	**Potential Emissions** (tons/year)
PM	392
PM_{10}	392
SO_2	99.7
VOC	33.4
CO	33.6
NO_x	59.1

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAP's	**Potential Emissions** (tons/year)
Glycol Ethers	6.66
Propylene Glycol	1.92
Lead	0.604
Formaldehyde	0.091
Toluene	0.017
Naphthalene	0.003
Benzene	0.001
Hexane	0.698
Dichlorobenzene	0.0005
POMs	0.0002
Arsenic	0.004
Chromium	0.002
Cobalt	0.017
Beryllium	0.001
Cadmium	0.001
Mercury	0.0001
Selenium	0.002
Manganese	0.008
Nickel	0.026
Xylene	0.0003
Antimony	0.015
Ethylbenzene	0.001
TOTAL	10.1

(a) The potential emissions (as defined in 326 IAC 1-2-55) of PM_{10} are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions from this source are based upon the known capacities. Since the source may handle various sized fans in the paint booths requiring various amounts and kinds of paint, the source has agreed that the potential emissions of any single hazardous air pollutant (HAP) may in actuality be greater than 10 tons per year using the existing equipment. Since the potential emissions (as defined in 326 IAC 1-2-55) of any single HAP can be equal to or greater than ten (10) tons per year using the existing equipment, the source is subject to the provisions of 326 IAC 2-7 due to single HAP emissions.

(c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the actual emissions from surface coating supplied by the applicant on Forms GSD-07 and GSD-08 of the application and the potential emissions from combustion, see pages 5, 6 and 7 of 7 of Appendix A. No previous emission data has been received from the source.

Pollutant	**Actual Emissions** (tons/year)
PM	11.2
PM_{10}	11.2
SO_2	98.8
VOC	14.9
CO	32.6
NO_x	55.7
HAP (Xylenes)	1.84
HAP (1,1,1 trichloroethane)	1.98
HAP (Perchloroethylene)	1.89
HAP (Toluene)	0.797
HAP (Lead)	0.604
HAP (Formaldehyde)	0.091
HAP (Naphthalene)	0.003
HAP (Benzene)	0.001
HAP (Hexane)	0.698
HAP (Dichlorobenzene)	0.0005
HAP (POMs)	0.0002
HAP (Arsenic)	0.004
HAP (Chromium)	0.002

Pollutant	Actual Emissions (tons/year)
HAP (Cobalt)	0.017
HAP (Beryllium)	0.001
HAP (Cadmium)	0.001
HAP (Mercury)	0.0001
HAP (Selenium)	0.002
HAP (Manganese)	0.008
HAP (Nickel)	0.026
HAP (Antimony)	0.015
HAP (Ethyl benzene)	0.001

Actual HAPs emitted represent HAP emissions in previous years. The HAPs now emitted (as indicated in the Potential Emissions table, page 5 of 15) are not the same HAPs because the source changed coatings to comply with 326 IAC 8-2-9 (Miscellaneous Metal Coating).

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Surface coating (p.b. 1, p.b. 2 and p.b. 3)	2.93	2.93	0.00	16.3	0.00	0.00	6.49
Two (2) boilers (b1 and b2)	9.09	9.09	97.7	2.11	32.6	55.1	0.732
Sand blasting (s.b. 1)	26.5	26.5	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.0	5.0	2.0	15.0	1.0	5.0	2.69
Total Emissions	43.5	43.5	99.7	33.4	33.6	60.1	9.91

County Attainment Status

The source is located in Fayette County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Fayette County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60 applicable to this source.

(b) The three (3) storage tanks for no. 2 fuel oil, constructed in 1975 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, Subpart K) because the capacity of each tank is less than 40,000 gallons.

(c) The boilers known as b2 and b3 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart D) because they were constructed prior to August 17, 1971. The one (1) boiler, identified as b1, constructed in 1983, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart Da) because it has a capacity less than 250 million British thermal units per hour.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Parts 61 and 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-7 (Stack Height Provisions)

Since the sand blast baghouse stack (stack 5) has potential emissions greater than 25 tons per year of PM_{10} and the two (2) significant boiler stacks (stacks 8 and 9) have potential emissions greater than 25 tons per year of SO_2 the requirements of 326 IAC 1-7 (Stack Height Provisions) are applicable to stacks 5, 8 and 9. Since the stack for boiler 2 (stack 9) was constructed prior to June 19, 1979, the requirements of 326 IAC 1-7-3 (Actual Stack Height Provisions) do not apply to that stack. Pursuant to 326 IAC 1-7-5(a), the provisions of 326 IAC 1-7-3(a) also do not apply to the sand blast stack (stack 5) which has actual emissions after controls of less than 25 tons per year of PM_{10}. Pursuant to 326 IAC 1-7-5(b) the requirements of 326 IAC 1-7-4 (Ambient Air Quality Modeling; Stack Height Provisions) will not apply to the boiler 2 stack (stack 9) constructed prior to December 31, 1970.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because the potential to emit PM_{10} is limited to less than one hundred (100) tons per year. Pursuant to 326 IAC 2-6-2 (Definitions), any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. Since the definition of potential to emit is the maximum capacity of a source to emit a pollutant under its physical and operational design, the limitations of 326 IAC 2-8 (FESOP) result in a potential to emit less than 100 tons per year of PM_{10}. Therefore, the requirements of 326 IAC 2-6 are not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-8 (FESOP)

The potential to emit PM_{10} from this source is greater than 100 tons per year. Therefore, the PM_{10} emissions shall be limited to less than 100 tons per year. The potential to emit each individual HAP is less than 10 tons per year based upon the known capacities of the facilities. The source, however, can coat different size fans, for which the capacity is unknown, using the existing equipment. This may result in slightly larger HAP emissions. Therefore, the source has agreed to limit individual HAP emissions to less than 10 tons per year. This will limit emissions to less than major source levels listed under 326 IAC 2-7 (Part 70 Permit Program). Specific facility limits are as follows:

(a) The baghouse for the sand blasting shall be in operation at all times when sand blasting, identified as s.b. 1, is taking place and the PM emissions shall not exceed, 6.05 pounds per hour as limited by 326 IAC 6-3-2. This will result in PM_{10} emissions of less than 100 tons per year. This will also result make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

(b) The total usage of each individual HAP at the three (3) paint booths, including the hand touchup, shall be limited to less than 9.83 tons per twelve (12) consecutive months, including coatings, dilution solvents, and cleaning solvents. When combined with the single HAP usage by the insignificant general cleanup activities, this will result in single HAP emissions of less than 10 tons per year from the entire source.

326 IAC 6-2-3 (Particulate emission limitations for sources of indirect heating)

Pursuant to the registration issued on August 13, 1982, the one (1) boiler, identified as b2, constructed in 1966 and the one (1) boiler, identified as b3, constructed in 1963, with maximum capacities of 25.1 million British thermal units per hour and 1.00 million British thermal units per hour, respectively, are subject to the requirements of 326 IAC 6-2. Since the two (2) boilers were existing and in operation prior to September 21, 1983, the boilers are subject to 326 IAC 6-2-3 and the limit is based upon the following calculation:

$$Pt = (C \times a \times h) / (76.5 \times Q^{0.75} \times N^{0.25})$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 million British thermal units per hour heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height will be computed using a weighted average of stack heights.

$$Pt = (50\ \mu g/m^3 \times 0.67 \times 36ft) / (76.5 \times 26.1^{0.75} \times 2^{0.25}) = 1.15\ lbs\ PM / MMBtu$$

This number is greater than the maximum allowable emissions stated in 326 IAC 6-2-3(d) for facilities which were existing and in operation on or before June 8, 1972. Therefore the allowable emissions for the two (2) boilers are 0.8 pound PM per million British thermal units.

Since the potential emissions are 2.71 tons per year, equivalent to 0.620 pounds per hour, when operating with no. 2 fuel oil, and 0.869 tons per year, equivalent to 0.198 pounds per hour, when operating with natural gas, the two (2) boilers will comply with this rule based upon the following calculation:

(0.620 lbs/hr / 2 boilers) / 26.1 MMBtu/hr = 0.024 pounds per million British thermal units

326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating)

The one (1) boiler, identified as b1, constructed in 1983, with a maximum capacity of 62.4 million British thermal units per hour will be subject to the requirements of 326 IAC 6-2. Since the one (1) boiler was constructed in 1983, the boiler will be considered to be constructed after September 21,

1983, to be conservative. Therefore, the boiler is subject to 326 IAC 6-2-4 and the limit is based upon the following calculation:

$$Pt = 1.09 / Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

$Pt = 1.09 / 88.5^{0.26} = 0.34$ lbs PM / MMBtu

Since the potential emissions from this one (1) boiler are 6.48 tons per year, equivalent to 1.48 pounds per hour, when operating with no. 2 fuel oil, and 2.08 tons per year, equivalent to 0.475 pounds per hour, when operating with natural gas, the boiler will comply with this rule based upon the following calculation:

1.48 lbs/hr / 62.4 MMBtu/hr = 0.024 pounds per million British thermal units

326 IAC 6-3-2 (Process Operations)

(a) The particulate matter (PM) from the three (3) paint booths, p.b. 1, p.b. 2 and p.b. 3 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times when the paint booths are in operation, in order to comply with this limit.

(b) The particulate matter (PM) from the one (1) sand blast booth, identified as s.b. 1, shall be limited to 6.05 pounds per hour when operating at the maximum process weight rate of 3,578 pounds of Aluminum Oxide 20 Grit per hour. Since the maximum potential emissions after controls by the baghouse are 0.818 pounds of PM per hour, the one (1) sand blast booth will comply with this rule. This limitation is based upon the following equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The baghouse shall be in operation at all times when the sand blast booth is in operation, in order to comply with this limit.

(c) The particulate matter (PM) from the insignificant manufacturing, grinding and machining, and Babbitt bar melting operations shall be limited by the following:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

Since the two (2) boilers, identified as b1 and b2, have the potential to emit more than 25 tons per year of SO_2 when operating on no. 2 fuel oil, the two (2) boilers will be subject to the requirements of 326 IAC 7-1.1-2. Sulfur dioxide emissions from these facilities when operating on no. 2 fuel oil shall be limited to five-tenths (0.5) pound per million British thermal units. In order for the source to comply with the requirements of 326 IAC 2-8 (FESOP) the sulfur content of the fuel may not exceed the potential weight percent sulfur of 0.25% supplied in the application. Using the potential weight percent sulfur of 0.25% supplied by the applicant, the boilers will be in compliance with this rule based upon the following calculations:

Boiler 1
0.25% x 142 = 35.5 pounds SO_2/kgal;
35.5 lbs/kgal x 3,929 kgals/yr = 139,480 lbs/yr;
139,480 lbs/yr / (62.5 MMBtu/hr * 8,760 hrs/yr) = 0.255 lbs/MMBtu

Boiler 2
0.25% x 142 = 35.5 pounds SO_2/kgal;
35.5 lbs/kgal x 1,580 kgals/yr = 56,090 lbs/yr;
56,090 lbs/yr / (62.5 MMBtu/hr * 8,760 hrs/yr) = 0.102 lbs/MMBtu

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to Registration CP (041) 2011-00010, issued on August 2, 1991, and pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the three (3) paint booths (p.b.1, p.b.2 and p.b.3), including hand touchup, with a total potential to emit more than 15 pounds per day of VOC, shall be limited to 3.5 pounds of VOCs per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is currently in compliance with this requirement.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The one (1) insignificant wash booth is not a cold cleaner or vapor degreaser. Therefore, the requirements of 326 IAC 8-3 are not applicable.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The three (3) paint booths (p.b.1, p.b.2 and p.b.3) have applicable compliance monitoring conditions as specified below:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (1A, 1B, 1C, 1D, 2 and 12) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

(b) The two (2) significant boilers (b1 and b2) have applicable compliance monitoring conditions as specified below:

Daily visible emission notations of the boiler stacks (stack 8 and 9) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-8 (FESOP).

(c) The sand blast facility has applicable compliance monitoring conditions as specified below:

(1) Daily visible emission notations of the sand blast baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the sand blasting, at least once weekly when the sand blasting process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of the permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

(3) An inspection shall be performed each calendar quarter of all bags controlling the sand blasting operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

(4) In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the sand blast facility must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations (pages 2, 3, and 7 of 7) for detailed air toxic calculations.

Conclusion

The operation of this industrial and commercial blower and fan manufacturing source shall be subject to the conditions of the attached proposed FESOP No. F 041-7130-00010.